



## Massachusetts Cannabis Control Commission

### Marijuana Retailer

#### General Information:

License Number: MR282618  
Original Issued Date: 05/25/2020  
Issued Date: 05/25/2020  
Expiration Date: 05/25/2021

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Lynn Organics LLC

Phone Number: 617-610-0761  
Email Address: aidan423@gmail.com

Business Address 1: One International Place  
Business City: Boston  
Business State: MA  
Business Zip Code: 02110  
Business Address 2: Suite 3700  
Mailing Address 1: 20 Authority Drive  
Mailing City: Fitchburg  
Mailing State: MA  
Mailing Zip Code: 01420  
Mailing Address 2:

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: yes  
Priority Applicant Type: RMD Priority  
Economic Empowerment Applicant Certification Number:  
RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD: NS AJO Holdings Inc. (Parent Company and Sole Owner of the Applicant)  
Department of Public Health RMD Registration Number:  
Operational and Registration Status: Obtained Provisional Certificate of Registration only  
To your knowledge, is the existing RMD certificate of registration in good standing?: yes  
If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

#### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 14.25  
Percentage Of Control:  
Role: Owner / Partner  
Other Role: Owner, President and Sole Director of NS AJO Holdings, Inc. (100% Owner of Lynn Organics)

First Name: Aidan	Last Name: O'Donovan	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 14.25	Percentage Of Control: 20	
Role: Other (specify)	Other Role: Owner and Treasurer of NS AJO Holdings, Inc.; Board Member for Natural Selections MA, Inc.	
First Name: Isador	Last Name: Mitzner	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 14.25	Percentage Of Control: 20	
Role: Other (specify)	Other Role: Owner and Secretary of NS AJO Holdings, Inc.; Board Member for Natural Selections MA, Inc.	
First Name: Brandon	Last Name: Banks	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 4

Percentage Of Ownership: 0.8	Percentage Of Control: 20	
Role: Other (specify)	Other Role: Owner; Board Member for Natural Selections MA, Inc.	
First Name: David	Last Name: Clapper	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 5

Percentage Of Ownership: 4	Percentage Of Control: 20	
Role: Other (specify)	Other Role: Owner; Board Member for Natural Selections MA, Inc.	
First Name: William	Last Name: Landman	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 6

Percentage Of Ownership:	Percentage Of Control: 20	
Role: Other (specify)	Other Role: Board Member for Natural Selections MA, Inc.	
First Name: Alex	Last Name: Chadwick	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Date generated: 12/03/2020		

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 7

Percentage Of Ownership:

Percentage Of  
Control:

Role: Executive / Officer

Other Role: Chief Financial Officer

First Name: Ramon

Last Name: Rivera

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:

Person with Direct or Indirect Authority 8

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role: Chief Operational Officer

First Name: Alex

Last Name: Hardy

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 9

Percentage Of Ownership:

Percentage Of Control:

Role: Other (specify)

Other Role: Director of Retail Operations

First Name: Tyler

Last Name: Vines

Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: NS AJO Holdings Inc.

Entity DBA:

DBA

City:

Entity Description: NS AJO Holdings Inc. is a Massachusetts Corporation seeking licensure for various Medical Marijuana Treatment Centers and Marijuana Establishments.

Foreign Subsidiary Narrative:

Entity Phone: 617-610-0761

Entity Email:

aidan423@gmail.com

Entity Website:

Entity Address 1: 67 Dana Street

Entity Address 2: Unit 1

Entity City: Cambridge

Entity State: MA

Entity Zip Code: 02138

Entity Mailing Address 1: 67 Dana Street

Entity Mailing Address 2: Unit 1

Entity Mailing City: Cambridge

Entity Mailing State: MA

Entity Mailing Zip Code:

02138

Relationship Description: NS AJO Holdings Inc. is the parent company of Lynn Organics LLC. NS AJO Holdings Inc. has also been issued a RMD priority registration number.

Entity with Direct or Indirect Authority 2

Percentage of Control: 100		Percentage of Ownership: 100	
Entity Legal Name: Natural Selections MA, Inc.		Entity DBA:	DBA City:
Entity Description: Natural Selections MA, Inc. is a Massachusetts Corporation engaged in the business of holding interests in cannabis entities in Massachusetts.			
Foreign Subsidiary Narrative:			
Entity Phone: 617-610-0761	Entity Email: aidan423@gmail.com	Entity Website:	
Entity Address 1: 80.5 Kinnaird Street	Entity State: MA	Entity Address 2:	
Entity City: Cambridge	Entity Zip Code: 02139	Entity Mailing Address 2:	
Entity Mailing Address 1: 80.5 Kinnaird Street	Entity Mailing State: MA	Entity Mailing Zip Code: 02139	
Relationship Description: Natural Selections MA, Inc. is the sole owner of NS AJO Holdings Inc., which is the parent company of Lynn Organics LLC.			

#### Entity with Direct or Indirect Authority 3

Percentage of Control:		Percentage of Ownership: 52.5	
Entity Legal Name: MLH Holdings LLC		Entity DBA:	DBA City:
Entity Description: MLH Holdings LLC is a Delaware Limited Liability Company engaged in the business of holding interests in cannabis entities in the United States.			
Foreign Subsidiary Narrative:			
Entity Phone: 212-370-0050	Entity Email: wlandman@mainlineco.com	Entity Website:	
Entity Address 1: 308 E. Lancaster Avenue	Entity State: PA	Entity Address 2: Suite 300	
Entity City: Wynnewood	Entity Zip Code: 19096	Entity Mailing Address 2: Suite 300	
Entity Mailing Address 1: 308 E. Lancaster Avenue	Entity Mailing State: PA	Entity Mailing Zip Code: 19096	
Entity Mailing City: Wynnewood			
Relationship Description: MLH Holdings LLC owns 52.5% of Lynn Organics LLC, via its ownership in Natural Selections MA, Inc.			

#### Entity with Direct or Indirect Authority 4

Percentage of Control:		Percentage of Ownership: 17.05	
Entity Legal Name: Linaria Investments LLC		Entity DBA:	DBA City:
Entity Description: Linaria Investments LLC is an entity invested in MLH Holdings, LLC.			
Foreign Subsidiary Narrative:			
Entity Phone: 215-609-3497	Entity Email: rgorovitz@belgravialp.com	Entity Website:	
Entity Address 1: 1201 Orange Street	Entity State: DE	Entity Address 2: Suite 731	
Entity City: Wilmington	Entity Zip Code: 19801	Entity Mailing Address 2: Suite 731	
Entity Mailing Address 1: 1201 Orange Street	Entity Mailing State: DE	Entity Mailing Zip Code: 19801	
Entity Mailing City: Wilimington			
Relationship Description: Linaria Investments LLC owns 17.05% of Lynn Organics LLC via its ownership in MLH Holdings LLC, which			



has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

Entity with Direct or Indirect Authority 5

Percentage of Control:	Percentage of Ownership: 17.05		
Entity Legal Name: Lobelia Holdings LLC		Entity DBA:	DBA City:
Entity Description: Lobelia Holdings LLC is an entity invested in Linaria Investments LLC.			
Foreign Subsidiary Narrative:			
Entity Phone: 215-609-3497	Entity Email: rgorovitz@belgravialp.com	Entity Website:	
Entity Address 1: 1201 Orange Street		Entity Address 2: Suite 731	
Entity City: Wilmington	Entity State: DE	Entity Zip Code: 19801	
Entity Mailing Address 1: 1201 Orange Street		Entity Mailing Address 2: Suite 731	
Entity Mailing City: Wilmington	Entity Mailing State: DE	Entity Mailing Zip Code: 19801	

**Relationship Description:** Lobelia Holdings LLC is the sole owner of Linaria Investments which owns 17.05% of NS AJO Holdings Inc. via its ownership in MLH Holdings LLC, which has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

Entity with Direct or Indirect Authority 6

Percentage of Control:	Percentage of Ownership: 17.05		
Entity Legal Name: The Lavatera Trust		Entity DBA:	DBA City:
Entity Description: The Lavatera Trust is a trust invested in Lobelia Holdings LLC.			
Foreign Subsidiary Narrative:			
Entity Phone: 215-609-3497	Entity Email: rgorovitz@belgravialp.com	Entity Website:	
Entity Address 1: 1201 Orange Street		Entity Address 2: Suite 731	
Entity City: Wilmington	Entity State: DE	Entity Zip Code: 19801	
Entity Mailing Address 1: 1201 Orange Street		Entity Mailing Address 2: Suite 731	
Entity Mailing City: Wilmington	Entity Mailing State: DE	Entity Mailing Zip Code: 19801	

**Relationship Description:** The Lavatera Trust is the sole owner of Lobelia Holdings LLC, which is the sole owner of Linaria Investments which owns 17.05% of NS AJO Holdings Inc. via its ownership in MLH Holdings LLC, which has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

Entity with Direct or Indirect Authority 7

Percentage of Control:	Percentage of Ownership: 17.05		
Entity Legal Name: MLIP MLH Investments, LLC		Entity DBA:	DBA City:
Entity Description: MLIP MLH Investments, LLC is an entity invested in MLH Holdings, LLC.			
Foreign Subsidiary Narrative:			
Entity Phone: 610-896-3000	Entity Email: dclapper@mainlineco.com	Entity Website:	
Entity Address 1: 308 E. Lancaster Avenue		Entity Address 2: Suite 300	
Entity City: Wynnewood	Entity State: PA	Entity Zip Code: 19096	
Entity Mailing Address 1: 308 E. Lancaster Avenue		Entity Mailing Address 2: Suite 300	
Entity Mailing City: Wynnewood	Entity Mailing State: PA	Entity Mailing Zip Code: 19096	

**Relationship Description:** MLIP MLH Investments LLC owns 17.05% of NS AJO Holdings Inc., via ownership in MLH Holdings LLC, which has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

**Entity with Direct or Indirect Authority 8**

**Percentage of Control:** **Percentage of Ownership:** 10.2

**Entity Legal Name:** The James Aresty 2008 Irrevocable Trust

**Entity DBA:**

**DBA**

**City:**

**Entity Description:** The James Aresty 2008 Irrevocable Trust is an entity invested in MLIP MLH Investments, LLC.

**Foreign Subsidiary Narrative:**

**Entity Phone:** 727-234-0127

**Entity Email:** mgoldberg@roseglenadvisors.com

**Entity Website:**

**Entity Address 1:** 400 Beach Drive

**Entity Address 2:** NE Unit 2605

**Entity City:** St. Petersburg

**Entity State:** FL

**Entity Zip Code:** 33701

**Entity Mailing Address 1:** 400 Beach Drive

**Entity Mailing Address 2:** NE Unit 2605

**Entity Mailing City:** St. Petersburg

**Entity Mailing State:** FL

**Entity Mailing Zip Code:**

33701

**Relationship Description:** The James Aresty 2008 Irrevocable Trust owns 10.2% of Lynn Organics LLC, via ownership in MLH Holdings LLC, which has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

**Entity with Direct or Indirect Authority 9**

**Percentage of Control:** **Percentage of Ownership:** 17.05

**Entity Legal Name:** L2015H, LLC

**Entity DBA:**

**DBA**

**City:**

**Entity Description:** L2015H, LLC is an entity invested in MLH Holdings, LLC.

**Foreign Subsidiary Narrative:**

**Entity Phone:** 856-661-4602

**Entity Email:** cookj@hongrp.com

**Entity Website:**

**Entity Address 1:** 8275 U.S. Route 130

**Entity Address 2:** Attn: Jeffrey W. Cook, c/o  
Pepsi-Cola & National Brand Beverages, Ltd.

**Entity City:** Pennsauken

**Entity State:** NJ

**Entity Zip Code:** 08110

**Entity Mailing Address 1:** 8275 U.S. Route 130

**Entity Mailing Address 2:** Attn: Jeffrey W. Cook,  
c/o Pepsi-Cola & National Brand Beverages, Ltd.

**Entity Mailing City:** Pennsauken

**Entity Mailing State:** NJ

**Entity Mailing Zip Code:**

08110

**Relationship Description:** L2015H, LLC owns 17.05% of NS AJO Holdings Inc., via ownership in MLH Holdings LLC, which has ownership interests in Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

**Entity with Direct or Indirect Authority 10**

**Percentage of Control:** 60 **Percentage of Ownership:** 52.5

**Entity Legal Name:** MLH MSO Holdco, Inc.

**Entity DBA:**

**DBA**

**City:**

**Entity Description:** MLH MSO Holdco, Inc. is a Delaware Corporation engaged in the business of holding interests in cannabis entities in the United States.

**Foreign Subsidiary Narrative:**

**Entity Phone:** 610-896-3004

**Entity Email:**  
dclapper@mainlineco.com

**Entity Website:**

**Entity Address 1:** 308 E. Lancaster Avenue

**Entity Address 2:** Suite 300

Entity City: Wynnewood	Entity State: PA	Entity Zip Code: 19096
Entity Mailing Address 1: 308 E. Lancaster Avenue		Entity Mailing Address 2: Suite 300
Entity Mailing City: Wynnewood	Entity Mailing State: PA	Entity Mailing Zip Code: 19096

Relationship Description: MLH MSO Holdco, Inc. 52.5% of Lynn Organics LLC, via its ownership in Natural Selections MA, Inc.

### CLOSE ASSOCIATES AND MEMBERS

#### Close Associates or Member 1

First Name: Robert	Last Name: Gorovitz	Suffix:
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Describe the nature of the relationship this person has with the Marijuana Establishment: Robert Gorovitz is the Trustee of the Lavatera Trust, which is the ultimate owner of 17.05% of Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

#### Close Associates or Member 2

First Name: Morey	Last Name: Goldberg	Suffix:
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Describe the nature of the relationship this person has with the Marijuana Establishment: Morey Goldberg is the Co-trustee of the James Aresty 2008 Irrevocable Trust, which is the ultimate owner of 10.2% of Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

#### Close Associates or Member 3

First Name: James	Last Name: Aresty	Suffix:
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Describe the nature of the relationship this person has with the Marijuana Establishment: James Aresty is the Co-trustee of the James Aresty 2008 Irrevocable Trust, which is the ultimate owner of 10.2% of Natural Selections MA, Inc., sole owner of NS AJO Holdings Inc., the Parent company for Lynn Organics LLC.

### CAPITAL RESOURCES - INDIVIDUALS

No records found

### CAPITAL RESOURCES - ENTITIES

#### Entity Contributing Capital 1

Entity Legal Name: Natural Selections MA Inc.	Entity DBA:		
Email: aidan423@gmail.com	Phone: 617-610-0761		
Address 1: 80.5 Kinnaird Street	Address 2:		
City: Cambridge	State: MA	Zip Code: 02139	
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of Capital Provided: \$1000000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

#### Business Interest in Other State 1

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

Owner First Name: Aidan	Owner Last Name: O'Donovan	Owner Suffix:
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Entity Legal Name: AJO Holdings LLC	Entity DBA: Natural Selections LLC
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Entity Description: Marijuana Establishment

Entity Phone: 303-379-9526	Entity Email: aidan423@gmail.com	Entity Website: http://naturalselections.farm/
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Entity Address 1: 920 W. 104th Avenue	Entity Address 2:
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Entity City: Northglenn	Entity State: CO	Entity Zip Code: 80234	Entity Country: USA
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Entity Mailing Address 1: 920 W. 104th Avenue		Entity Mailing Address 2:	
Entity Mailing City: Northglenn	Entity Mailing State: CO	Entity Mailing Zip Code: 80234	Entity Mailing Country: USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: David	Owner Last Name: Clapper	Owner Suffix:	
Entity Legal Name: Plants of Ruskin, LLC		Entity DBA:	
Entity Description: Marijuana Establishment in Florida. David Clapper and William Landman have ownership interests in this Marijuana Establishment through their interests in Mainline Investment Partners.			
Entity Phone: 813-645-2528	Entity Email: johntipton@altmed.co	Entity Website:	
Entity Address 1: 901 4th Street N. W.		Entity Address 2:	
Entity City: Ruskin	Entity State: FL	Entity Zip Code: 33570	Entity Country: USA
Entity Mailing Address 1: 901 4th Street N. W.		Entity Mailing Address 2:	
Entity Mailing City: Ruskin	Entity Mailing State: FL	Entity Mailing Zip Code: 33570	Entity Mailing Country: USA

Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: David	Owner Last Name: Clapper	Owner Suffix:	
Entity Legal Name: Fort Consulting, LLC		Entity DBA:	
Entity Description: Marijuana Establishment in Arizona. David Clapper and William Landman have ownership interests in this Marijuana Establishment through their interests in Mainline Investment Partners.			
Entity Phone: 602-358-8771	Entity Email: reggie@agronomyinnovations.com	Entity Website:	
Entity Address 1: 12620 N. Cave Creek Road		Entity Address 2: Suite 1	
Entity City: Phoenix	Entity State: AZ	Entity Zip Code: 85022	Entity Country: USA
Entity Mailing Address 1: 12620 N. Cave Creek Road		Entity Mailing Address 2: Suite 1	
Entity Mailing City: Phoenix	Entity Mailing State: AZ	Entity Mailing Zip Code: 85022	Entity Mailing Country: USA

Business Interest in Other State 4

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: William	Owner Last Name: Landman	Owner Suffix:	
Entity Legal Name: Plants of Ruskin, LLC		Entity DBA:	
Entity Description: Marijuana Establishment in Florida. David Clapper and William Landman have ownership interests in this Marijuana Establishment through their interests in Mainline Investment Partners.			
Entity Phone: 813-645-2528	Entity Email: johntipton@altmed.com	Entity Website:	
Entity Address 1: 901 4th Street N.W.		Entity Address 2:	
Entity City: Ruskin	Entity State: FL	Entity Zip Code: 33570	Entity Country: USA
Entity Mailing Address 1: 901 4th Street N.W.		Entity Mailing Address 2:	
Entity Mailing City: Ruskin	Entity Mailing State: FL	Entity Mailing Zip Code: 33570	Entity Mailing Country: USA

Business Interest in Other State 5

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

**Owner First Name:** William      **Owner Last Name:** Landman      **Owner Suffix:**

**Entity Legal Name:** Fort Consulting, LLC      **Entity DBA:**

**Entity Description:** Marijuana Establishment in Arizona. David Clapper and William Landman have ownership interests in this Marijuana Establishment through their interests in Mainline Investment Partners.

**Entity Phone:** 602-358-8771      **Entity Email:** reggie@agronomyinnovations.com      **Entity Website:**

**Entity Address 1:** 12620 N Cave Creek Rd      **Entity Address 2:** Suite 1

**Entity City:** Phoenix      **Entity State:** AZ      **Entity Zip Code:** 80522      **Entity Country:** USA

**Entity Mailing Address 1:** 12620 N Cave Creek Rd      **Entity Mailing Address 2:** Suite 1

**Entity Mailing City:** Phoenix      **Entity Mailing State:** AZ      **Entity Mailing Zip Code:** 80522      **Entity Mailing Country:** USA

**Business Interest in Other State 6****Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

**Owner First Name:** David      **Owner Last Name:** Clapper      **Owner Suffix:**

**Entity Legal Name:** MLH Explorations, LLC      **Entity DBA:**

**Entity Description:** MLH Explorations, LLC possesses a Clinical Registrant permit in Pennsylvania under the state's medical marijuana program allowing the company to develop and operate one cultivation and processing facility and up to six dispensary locations.

**Entity Phone:** 617-407-0966      **Entity Email:** ramon@naturalselectionsma.com      **Entity Website:**

**Entity Address 1:** 308 E Lancaster Avenue      **Entity Address 2:** Suite 300

**Entity City:** Wynnewood      **Entity State:** PA      **Entity Zip Code:** 19096      **Entity Country:** USA

**Entity Mailing Address 1:** 308 E Lancaster Avenue      **Entity Mailing Address 2:** Suite 300

**Entity Mailing City:** Wynnewood      **Entity Mailing State:** PA      **Entity Mailing Zip Code:** 19096      **Entity Mailing Country:** USA

**Business Interest in Other State 7****Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

**Owner First Name:** William      **Owner Last Name:** Landman      **Owner Suffix:**

**Entity Legal Name:** MLH Explorations, LLC      **Entity DBA:**

**Entity Description:** MLH Explorations, LLC possesses a Clinical Registrant permit in Pennsylvania under the state's medical marijuana program allowing the company to develop and operate one cultivation and processing facility and up to six dispensary locations.

**Entity Phone:** 617-407-0966      **Entity Email:** ramon@naturalselectionsma.com      **Entity Website:**

**Entity Address 1:** 308 E Lancaster Avenue      **Entity Address 2:** Suite 300

**Entity City:** Wynnewood      **Entity State:** PA      **Entity Zip Code:** 19096      **Entity Country:** USA

**Entity Mailing Address 1:** 308 E Lancaster Avenue      **Entity Mailing Address 2:** Suite 300

**Entity Mailing City:** Wynnewood      **Entity Mailing State:** PA      **Entity Mailing Zip Code:** 19096      **Entity Mailing Country:** USA

**DISCLOSURE OF INDIVIDUAL INTERESTS****Individual 1**

**First Name:** Aidan      **Last Name:** O'Donovan      **Suffix:**

**Marijuana Establishment Name:** NS AJO Holdings Inc.      **Business Type:** Marijuana Retailer

**Marijuana Establishment City:** Fitchburg      **Marijuana Establishment State:** MA

#### Individual 2

First Name: Aidan	Last Name: O'Donovan	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 3

First Name: Aidan	Last Name: O'Donovan	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 4

First Name: Isador	Last Name: Mitzner	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 5

First Name: Isador	Last Name: Mitzner	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 6

First Name: Isador	Last Name: Mitzner	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 7

First Name: Brandon	Last Name: Banks	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 8

First Name: Brandon	Last Name: Banks	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 9

First Name: Brandon	Last Name: Banks	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 10

First Name: David	Last Name: Clapper	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 11

First Name: David	Last Name: Clapper	Suffix:
Marijuana Establishment Name: NS AJO Holdings Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Fitchburg	Marijuana Establishment State: MA	

#### Individual 12

**First Name:** David                      **Last Name:** Clapper                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Product Manufacture  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 13

**First Name:** William                      **Last Name:** Landman                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 14

**First Name:** William                      **Last Name:** Landman                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 15

**First Name:** William                      **Last Name:** Landman                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Product Manufacture  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 16

**First Name:** Alex                      **Last Name:** Chadwick                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 17

**First Name:** Alex                      **Last Name:** Chadwick                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 18

**First Name:** Alex                      **Last Name:** Chadwick                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Product Manufacture  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 19

**First Name:** Alex                      **Last Name:** Hardy                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 20

**First Name:** Alex                      **Last Name:** Hardy                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 21

**First Name:** Alex                      **Last Name:** Hardy                      **Suffix:**  
**Marijuana Establishment Name:** NS AJO Holdings Inc.                      **Business Type:** Marijuana Product Manufacture  
**Marijuana Establishment City:** Fitchburg                      **Marijuana Establishment State:** MA

#### Individual 22

<b>First Name:</b> Ramon	<b>Last Name:</b> Rivera	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 23

<b>First Name:</b> Ramon	<b>Last Name:</b> Rivera	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 24

<b>First Name:</b> Ramon	<b>Last Name:</b> Rivera	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 25

<b>First Name:</b> Tyler	<b>Last Name:</b> Vines	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 26

<b>First Name:</b> Tyler	<b>Last Name:</b> Vines	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 27

<b>First Name:</b> Tyler	<b>Last Name:</b> Vines	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 28

<b>First Name:</b> Robert	<b>Last Name:</b> Gorovitz	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 29

<b>First Name:</b> Robert	<b>Last Name:</b> Gorovitz	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 30

<b>First Name:</b> Robert	<b>Last Name:</b> Gorovitz	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	

#### Individual 31

<b>First Name:</b> Morey	<b>Last Name:</b> Goldberg	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> NS AJO Holdings Inc.	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Fitchburg	<b>Marijuana Establishment State:</b> MA	



#### Individual 32

First Name: Morey Last Name: Goldberg Suffix:  
Marijuana Establishment Name: NS AJO Holdings Inc. Business Type: Marijuana Cultivator  
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

#### Individual 33

First Name: Morey Last Name: Goldberg Suffix:  
Marijuana Establishment Name: NS AJO Holdings Inc. Business Type: Marijuana Product Manufacture  
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

#### Individual 34

First Name: James Last Name: Aresty Suffix:  
Marijuana Establishment Name: NS AJO Holdings Inc. Business Type: Marijuana Retailer  
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

#### Individual 35

First Name: James Last Name: Aresty Suffix:  
Marijuana Establishment Name: NS AJO Holdings Inc. Business Type: Marijuana Cultivator  
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

#### Individual 36

First Name: James Last Name: Aresty Suffix:  
Marijuana Establishment Name: NS AJO Holdings Inc. Business Type: Marijuana Product Manufacture  
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 193-195 Oxford Street  
Establishment Address 2:  
Establishment City: Lynn Establishment Zip Code: 01901  
Approximate square footage of the establishment: 3936 How many abutters does this property have?: 5  
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	CCC host certification.pdf	pdf	5d1c111ebc101905252e5a2b	07/02/2019
Plan to Remain Compliant with Local Zoning	Lynn Organics - Zoning Compliance Plan.pdf	pdf	5d1d1202f29d1909b30c00a4	07/03/2019
Community Outreach Meeting Documentation	Lynn Organics LLC - Community Outreach Documents.pdf	pdf	5d77109d816d7b225d1598ea	09/09/2019

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Lynn Organics - Positive Impact Plan.pdf	pdf	5e547ae2fe55e40432f72b6f	02/24/2020

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

#### INDIVIDUAL BACKGROUND INFORMATION

##### Individual Background Information 1

Role: Owner / Partner      Other Role:

First Name: Aidan      Last Name: O'Donovan      Suffix:

RMD Association: RMD Owner

Background Question: yes

##### Individual Background Information 2

Role: Owner / Partner      Other Role:

First Name: Isador      Last Name: Mitzner      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 3

Role: Executive / Officer      Other Role:

First Name: Brandon      Last Name: Banks      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 4

Role: Director      Other Role:

First Name: David      Last Name: Clapper      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 5

Role: Director      Other Role:

First Name: William      Last Name: Landman      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 6

Role: Other (specify)      Other Role: Board Member for Natural Selections MA, Inc.

First Name: Alex      Last Name: Chadwick      Suffix:

RMD Association: RMD Owner

Background Question: no

##### Individual Background Information 7

Role: Executive / Officer      Other Role: Chief Financial Officer

First Name: Ramon      Last Name: Rivera      Suffix:

RMD Association: RMD Staff

Background Question: no

#### Individual Background Information 8

Role: Executive / Officer      Other Role: Chief Operational Officer

First Name: Alex      Last Name: Hardy      Suffix:

RMD Association: RMD Staff

Background Question: no

#### Individual Background Information 9

Role: Other (specify)      Other Role: Director of Retail Operations

First Name: Tyler      Last Name: Vines      Suffix:

RMD Association: RMD Staff

Background Question: no

#### Individual Background Information 10

Role: Other (specify)      Other Role: Trustee of trust holding greater than 10% interest in the Applicant

First Name: James      Last Name: Aresty      Suffix:

RMD Association: RMD Owner

Background Question: no

#### Individual Background Information 11

Role: Other (specify)      Other Role: Trustee of trust holding greater than 10% interest in the Applicant

First Name: Robert      Last Name: Gorovitz      Suffix:

RMD Association: RMD Owner

Background Question: no

#### Individual Background Information 12

Role: Other (specify)      Other Role: Trustee of trust holding greater than 10% interest in the Applicant

First Name: Morey      Last Name: Goldberg      Suffix:

RMD Association: RMD Owner

Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

##### Entity Background Check Information 1

Role: Parent Company

Other Role:

Entity Legal Name: NS AJO Holdings Inc.

Entity DBA:

Entity Description: NS AJO Holdings Inc. is a Massachusetts Corporation seeking licensure for various Medical Marijuana Treatment Center and Marijuana Establishment Licenses.

Phone: 617-610-0761

Email: aidan423@gmail.com

Primary Business Address 1: 67 Dana Street

Primary Business Address 2: Unit 1

Primary Business City: Cambridge

Primary Business State: MA

Principal Business Zip Code: 02138

Additional Information:

##### Entity Background Check Information 2

Role: Other (specify)

Other Role: Owner

Entity Legal Name: Natural Selections MA, Inc.

Entity DBA:

**Entity Description:** Natural Selections MA, Inc. is a Massachusetts Corporation engaged in the business of holding interests in cannabis entities in Massachusetts.

**Phone:** 617-610-0761

**Email:** aidan423@gmail.com

**Primary Business Address 1:** 80.5 Kinnaird Street

**Primary Business Address 2:**

**Primary Business City:** Cambridge

**Primary Business State:** MA

**Principal Business Zip Code:** 02139

**Additional Information:**

#### Entity Background Check Information 3

**Role:** Other (specify)

**Other Role:** Owner

**Entity Legal Name:** MLH Holdings LLC

**Entity DBA:**

**Entity Description:** MLH Holdings LLC is a Delaware Limited Liability Company engaged in the business of holding interests in cannabis entities in the United States.

**Phone:** 212-370-0050

**Email:** wlandman@mainlineco.com

**Primary Business Address 1:** 308 E. Lancaster Avenue

**Primary Business Address 2:** Suite 300

**Primary Business City:** Wynnwood

**Primary Business State:** PA

**Principal Business Zip Code:** 19096

**Additional Information:**

#### Entity Background Check Information 4

**Role:** Other (specify)

**Other Role:** Owner

**Entity Legal Name:** Linaria Investments LLC

**Entity DBA:**

**Entity Description:** Linaria Investments LLC is an entity invested in MLH Holdings, LLC.

**Phone:** 215-609-3497

**Email:** rgorovitz@belgravialp.com

**Primary Business Address 1:** 1201 Orange Street

**Primary Business Address 2:** Suite 731

**Primary Business City:** Wilmington

**Primary Business State:** DE

**Principal Business Zip Code:** 19801

**Additional Information:**

#### Entity Background Check Information 5

**Role:** Other (specify)

**Other Role:** Owner

**Entity Legal Name:** Lobelia Holdings LLC

**Entity DBA:**

**Entity Description:** Lobelia Holdings LLC is an entity invested in Linaria Investments LLC.

**Phone:** 215-609-3497

**Email:** rgorovitz@belgravialp.com

**Primary Business Address 1:** 1201 Orange Street, , DE 19801

**Primary Business Address 2:** Suite 731

**Primary Business City:** Wilmington

**Primary Business State:** DE

**Principal Business Zip Code:** 19801

**Additional Information:**

#### Entity Background Check Information 6

**Role:** Other (specify)

**Other Role:** Owner

**Entity Legal Name:** The Lavatera Trust

**Entity DBA:**

**Entity Description:** The Lavatera Trust is a trust invested in Lobelia Holdings LLC.

**Phone:** 215-609-3497

**Email:** rgorovitz@belgravialp.com

<b>Primary Business Address 1:</b> 1201 Orange Street		<b>Primary Business Address 2:</b> Suite 731
<b>Primary Business City:</b> Wilmington	<b>Primary Business State:</b> DE	<b>Principal Business Zip Code:</b> 19801
<b>Additional Information:</b>		
<b>Entity Background Check Information 7</b>		
<b>Role:</b> Other (specify)	<b>Other Role:</b> Owner	
<b>Entity Legal Name:</b> MLIP MLH Investments, LLC	<b>Entity DBA:</b>	
<b>Entity Description:</b> MLIP MLH Investments, LLC is an entity invested in MLH Holdings, LLC.		
<b>Phone:</b> 610-896-3000	<b>Email:</b> dclapper@mainlineco.com	
<b>Primary Business Address 1:</b> 308 E. Lancaster Avenue	<b>Primary Business Address 2:</b> Suite 300	
<b>Primary Business City:</b> Wynnewood	<b>Primary Business State:</b> PA	<b>Principal Business Zip Code:</b> 19096
<b>Additional Information:</b>		
<b>Entity Background Check Information 8</b>		
<b>Role:</b> Other (specify)	<b>Other Role:</b> Owner	
<b>Entity Legal Name:</b> The James Aresty 2008 Irrevocable Trust	<b>Entity DBA:</b>	
<b>Entity Description:</b> The James Aresty 2008 Irrevocable Trust is an entity invested in MLIP MLH Investments, LLC.		
<b>Phone:</b> 727-234-0127	<b>Email:</b> mgoldberg@roseglenadvisors.com	
<b>Primary Business Address 1:</b> 400 Beach Drive	<b>Primary Business Address 2:</b> NE Unit 2605	
<b>Primary Business City:</b> St. Petersburg	<b>Primary Business State:</b> FL	<b>Principal Business Zip Code:</b> 33701
<b>Additional Information:</b>		
<b>Entity Background Check Information 9</b>		
<b>Role:</b> Other (specify)	<b>Other Role:</b> Owner	
<b>Entity Legal Name:</b> L2015H, LLC	<b>Entity DBA:</b>	
<b>Entity Description:</b> L2015H, LLC is an entity invested in MLH Holdings, LLC.		
<b>Phone:</b> 856-661-4602	<b>Email:</b> cookj@hongrp.com	
<b>Primary Business Address 1:</b> 8275 U.S. Route 130	<b>Primary Business Address 2:</b> Attn: Jeffrey W. Cook, c/o Pepsi-Cola & National Brand Beverages, Ltd.	
<b>Primary Business City:</b> Pennsauken	<b>Primary Business State:</b> NJ	<b>Principal Business Zip Code:</b> 08110
<b>Additional Information:</b>		
<b>Entity Background Check Information 10</b>		
<b>Role:</b> Other (specify)	<b>Other Role:</b> Owner	
<b>Entity Legal Name:</b> MLH MSO Holdco, Inc.	<b>Entity DBA:</b>	
<b>Entity Description:</b> MLH MSO Holdco, Inc. is a Delaware corporation engaged in the business of holding interests in cannabis entities in the United States		
<b>Phone:</b> 610-896-3004	<b>Email:</b> dclapper@mainlineco.com	
<b>Primary Business Address 1:</b> 308 E. Lancaster Avenue	<b>Primary Business Address 2:</b> Suite 300	

Primary Business City: Wynnewood

Primary Business State: PA

Principal Business Zip

Code: 19096

Additional Information:

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Lynn Organics - Cert of Organization.pdf	pdf	5cb90612cee9f84c3436509d	04/18/2019
Bylaws	Lynn Organics LLC - Operating Agreement - SIGNED.PDF	pdf	5d1bfddb9c49a009f10bbc27	07/02/2019
Department of Revenue - Certificate of Good standing	Lynn Organics Certificate of Good Standing.pdf	pdf	5d1bfde2d89d4b09aca61517	07/02/2019
Secretary of Commonwealth - Certificate of Good Standing	Lynn Organics LLC - Certificate of Good Standing - 2019-04-23.pdf	pdf	5d1bfdf4f29d1909b30bfe6a	07/02/2019

No documents uploaded

Massachusetts Business Identification Number: 001340870

Doing-Business-As Name: Ethos Cannabis

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Lynn Organics - Insurance Policy.pdf	pdf	5cb914e951be434c62d2a2b0	04/18/2019
Proposed Timeline	Lynn Organics - Timeline.pdf	pdf	5d1bfe974dc82309e61bd828	07/02/2019
Business Plan	Lynn Organics Business Plan.07 10-04-19 (Final).pdf	pdf	5d9f780a08d9401ae68c7288	10/10/2019

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Separating recreational from medical operations, if applicable	Lynn Organics - Separate Rec from Med Policy.pdf	pdf	5cb9155fcee9f84c343650b0	04/18/2019
Inventory procedures	Lynn Organics - Inventory Policy.pdf	pdf	5cb917935c356a44cb768692	04/18/2019
Transportation of marijuana	Lynn Organics - Transportation Policy.pdf	pdf	5cb91795f25dae4c6c3f197d	04/18/2019
Storage of marijuana	Lynn Organics - Storage Policy.pdf	pdf	5cb917970a957444d59088d7	04/18/2019
Restricting Access to age 21 and older	Lynn Organics - Restricting Access Policy.pdf	pdf	5cb9179bcee9f84c343650b4	04/18/2019
Maintaining of financial records	Lynn Organics - Financial Record Maintenance Policy.pdf	pdf	5cb917bf36e3e844f3b51ac5	04/18/2019

Record Keeping procedures	Lynn Organics - Record Retention Policy.pdf	pdf	5cb917c1b1ec4a4c446c21be	04/18/2019
Personnel policies including background checks	Lynn Organics - Personnel Policy.pdf	pdf	5cb917c373349d44fd62a171	04/18/2019
Dispensing procedures	Lynn Organics - Dispensing Policy.pdf	pdf	5cb917c5e2695d45078d6bb3	04/18/2019
Quality control and testing	Lynn Organics - Quality Control Policy.pdf	pdf	5cb917c7df25934c58f8535a	04/18/2019
Qualifications and training	Lynn Organics - Employee Policy.pdf	pdf	5cb917d151be434c62d2a2b4	04/18/2019
Plan for obtaining marijuana or marijuana products	Lynn Organics - Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	5d1bff145457e109c526e500	07/02/2019
Security plan	Lynn Organics - Security Plan.pdf	pdf	5d1bff7942805c051718ad36	07/02/2019
Prevention of diversion	Lynn Organics - Diversion Prevention Plan 2019.09.10.pdf	pdf	5d98f3fbc1731c15b88f330e	10/05/2019
Diversity plan	Lynn Organics - Diversity Plan 2019.12.05.pdf	pdf	5df56183f76dd253236e09e7	12/14/2019

#### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

#### ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

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



## 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

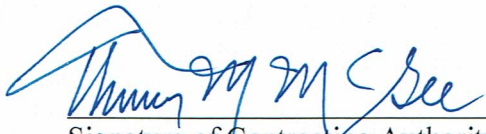
I, Aidan O'Donovan, (*insert name*) certify as an authorized representative of Lynn Organics LLC (*insert name of applicant*) that the applicant has executed a host community agreement with the City of Lynn (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on \_\_\_\_\_ (*insert date*).



Signature of Authorized Representative of Applicant

### Host Community

I, Thomas M Mc Gee, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Lynn (*insert name of host community*) to certify that the applicant and the City of Lynn (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on April 4th 2019 (*insert date*).



Signature of Contracting Authority or  
Authorized Representative of Host Community

## *Lynn Organics LLC*

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

The City of Lynn amended its zoning code in October of 2018 to allow the cultivation, production and dispensing of marijuana for adult-use in various zoning districts. Please see the attached zoning amendment for reference.

Lynn Organics LLC (the “**Company**”), is proposing to develop and operate a Marijuana Establishment, and more specifically a Marijuana Retailer at 193-195 Oxford Street, Lynn, MA 01901 (the “**Marijuana Establishment**”). This site is located in the Central Business Zoning District (“CBD”), and pursuant to Section 22 of the City of Lynn Zoning Ordinance, the operation of a Marijuana Establishment is permitted through the granting of a Special Permit from the City Council (the “**Board**”). Please also see the attached Special Permit.

The Company has discussed the Marijuana Establishment with city officials, including the building department, planning department, police department and fire department, and has appeared before the Board and entered into a host community agreement with the City. The Company received a Special Permit from the Board on January 22, 2019.

The Company plans to continue to work with officials from the City to ensure the operations will have a positive impact on the community and will work diligently to obtain all necessary approvals and permitting.

The Company hereby submits that it will continue to comply with all local and state requirements and Aidan O'Donovan will be responsible for ongoing compliance with local and state rules and regulations.

**IN THE YEAR TWO THOUSAND AND EIGHTEEN AN ORDINANCE AMENDING  
THE ZONE ORDINANCE OF THE CITY OF LYNN TO ESTABLISH A  
RECREATIONAL CANNABIS OVERLAY DISTRICT**

**Section 1. Purpose.** The purpose of this section is to regulate the time, place and manner of Cannabis establishments. The zoning will serve to preserve the character of the community and create a place for residents to responsibly have access to legal cannabis while mitigating community impact. This ordinance should serve as a guide that will support the citizens' right to access legal cannabis, protecting the public health and safety and expanding new growth for the tax base.

**Section 2. Scope.** This section relates only to Cannabis establishments authorized by General Laws, Chapter 94G, and not to medical Cannabis treatment centers authorized by General Laws, Chapter 941, the location and operation of which is governed elsewhere in this Ordinance, nor to Cannabis-related businesses not required to be licensed by Chapter 94G.

**Section 3. Definitions**

*For the purpose of this document the word Cannabis is used in place of Marijuana as found in MA General Laws, Chapter 94G*

- a. **Commission (CCC):** the Cannabis Control Commission.
- b. **Community Host Agreement:** an agreement, pursuant to General Laws, Chapter 94G, Section 3(d), between a Cannabis establishment and a municipality setting forth additional conditions for the operation of a Cannabis establishment, including stipulations of responsibility between the parties and a up to 3% host agreement revenue sharing.
- c. **Craft Co-Op:** a Cannabis cultivator comprised of residents of the commonwealth organized as a limited liability company or limited liability partnership under the laws of the commonwealth, or an appropriate business structure as determined by the commission, and that is licensed to cultivate, obtain, manufacture, process, package and brand Cannabis and Cannabis products to deliver Cannabis to Cannabis establishments but not to consumers.
- d. **Independent testing laboratory:** a laboratory that is licensed by the commission and is:
  - (1) Accredited to the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved by the commission;

- (2) Independent financially from any medical Cannabis treatment center or any licensee or Cannabis establishment for which it conducts a test; and
  - (3) Qualified to test Cannabis in compliance with regulations promulgated by commission pursuant to this chapter.
- e. **Cannabis cultivator:** an entity licensed to cultivate, process and package Cannabis, to deliver Cannabis to Cannabis establishments and to transfer Cannabis to other Cannabis establishments, but not to consumers.
- f. **Cannabis Cultivation:** Use of land and/or buildings for planting, tending, improving, harvesting, processing and packaging, the preparation and maintenance of soil and other media and promoting the growth of cannabis by a Marijuana Cultivator, Micro-Business, Research Facility, Craft Marijuana Cultivator Cooperative, Registered Marijuana Dispensary or other entity licensed by the Commission for cannabis cultivation. Such use is not agriculturally exempt from zoning.
- g. **Cannabis establishment:** a Cannabis cultivator, independent testing laboratory, Cannabis product manufacturer, Cannabis retailer or any other type of Cannabis business Licensed under Chapter 94G of the General Laws. The term does not include establishments whose business is related to Cannabis but does not involve the handling of Cannabis, for example, cultivation supplies and equipment.
- h. **Cannabis product manufacturer:** an entity licensed to obtain, manufacture, process and package Cannabis and Cannabis products, to deliver Cannabis and Cannabis products to Cannabis establishments and to transfer Cannabis and Cannabis products to other Cannabis establishments, but not to consumers.
- i. **Cannabis products:** products that have been manufactured and contain Cannabis or an extract from Cannabis, including concentrated forms of Cannabis and products composed of Cannabis and other ingredients that are intended for use or consumption, including edible products, beverages, topical products, ointments, oils and tinctures.
- j. **Cannabis retailer:** an entity licensed to purchase and deliver Cannabis and Cannabis products from Cannabis establishments and to deliver, sell or otherwise transfer Cannabis and Cannabis products to Cannabis establishments and to consumers.
- k. **Micro-Business:** a cannabis establishment that is licensed to act as a: licensed cannabis cultivator in an area less than 5,000 square feet; licensed cannabis product manufacturer, and licensed cannabis delivery service in compliance with the operating procedures for each such license.

#### **Section 4. Place**

- a. No Cannabis establishment (except a cannabis retail sales storefront which has been permitted to operate as a medical cannabis treatment center, shall be located within 200 feet of pre-existing public or private school providing education in kindergarten or any of grades 1 through 12 licensed by the Department of Education. in operation at the time of application for a special permit or site plan approval as measured by a typical path of travel door to door. This exception shall not apply to cannabis retail stores who are permitted to operate as a medical cannabis treatment center within the medical cannabis treatment center overlay district.
- b. No Cannabis establishment shall be located within 500 feet of another licensed Cannabis establishment.
- c. No Cannabis establishment shall be located within a building containing residential units, except mixed use buildings in the (CBD) and (BSBZ) zones. This prohibition includes transient housing or group housing.
- d. As defined in M.G.L. c. 94G, the number of cannabis retail storefronts shall be limited to not more than 20% of the number of licenses issued within the City for the retail sale of alcoholic beverages not to be drunk on the premises where sold under M.G.L. c. 138, §15.

Business type	Zone allowed
Cannabis retail sales storefront.	B3, B, BSBZ, CBD, LI, HI <sup>1</sup>
Independent testing laboratory	B3, B, BSBZ, CBD, LI, HI
Delivery	B3, B, CBD, LI, HI
Cultivation, manufacturer	LI, HI

<sup>1</sup> Except retail cannabis sale storefronts that have also been permitted to operate a medical cannabis treatment center in any district in the City of Lynn within the medical cannabis treatment center overlay districts may be allowed in the zoning district in which there are allowed to dispense medical cannabis.

- e. All Cannabis cultivation, processing, testing, product manufacturing, retail, and other state-licensed Cannabis businesses shall operate within a fully enclosed building. For purposes of this section, a greenhouse shall be considered a "fully enclosed building." However, a partially enclosed deck that is part of a Cannabis business is allowed, as long as other provisions of this ordinance are met.
- f. A Cannabis retail sales storefront is permitted by Special Permit in the B, B3, BSBZ, CBD, LI and HI zoning district as well as those permitted within the medical cannabis treatment overlay district.
- g. An independent testing laboratory is permitted by Special Permit in the B3, B, BSBZ, CBD, LI and HI zoning districts.
- h. A craft co-opt, cannabis cultivator, cannabis product manufacturer and micro-business shall be permitted by Special Permit in the LI and HI zoning districts.

## **Section 5. Time and manner**

- a. **Odor:** No Cannabis establishment shall allow the escape of noxious odors. They shall incorporate odor control technology and provisions, and ensure that emission do not violate MGL Chapter 111, Section 31 C.
- b. **Signage:** All business signage shall be subject to the requirements of the Cannabis Control Commission, ordinances of the City of Lynn and any conditions contained in the Special Permit.
- c. **Visual Impact:** Cannabis plants, products, and paraphernalia shall not be visible from outside the building in which the cannabis establishment is located. No outside storage of any cannabis plants, products and paraphernalia is permitted.
- d. **Home Occupation.** Cannabis establishments are not permitted as a Home Occupation.
- e. **Security.** Every application for a Special Permit for the operation of a Cannabis establishment shall include a security plan describing all security measures. This should include site security, security for the transportation of Cannabis and Cannabis products. Safety plans should mitigate any potential harm to the employees and the public including ensuring all customers are 21+. These plans shall be kept private (between the city and establishment) and out of the public record for the security of the establishment.

## **Section 6 Other**

- a. **Community Host Agreement.** Any Special Permit Any Special Permit issued by the Lynn City Council shall be conditioned on the execution of a Community Host Agreement.

- b. **State Law.** Cannabis establishment operations shall conform at all times to General Laws, Chapter 94G, and regulations issued thereunder.
- c. **License requirement.** The applicant shall submit proof that the application to the Cannabis Control Commission has been deemed complete pursuant to 935 CMR 500.102. Copies of the complete application, to the extent legally allowed, shall be provided as integral component of the application to the Lynn City Council. No person shall operate a Cannabis establishment without having a license in good standing from the Commission (CCC).
- d. **Energy Use.** All cannabis cultivators shall submit an energy use plan to the Lynn City Council to demonstrate best practices for energy conservation. The plan shall include an electrical system overview, proposed energy demand, ventilation system and air quality, proposed water system and utility demand.
- e. **Line Queue Plan.** The applicant shall submit a line queue plan to ensure the that the movement of pedestrian and/or vehicular traffic along the public right of ways will not be disrupted.
- f. **Traffic Impact Statement.** Any cannabis establishment open to the general public (such as retail dispensary, or, social consumption and delivery only operations) may be required to submit a detailed Traffic Impact Statement. This is required in each case where a proposed new building, use or project will contain more than 10,000 square feet, or will include one of the following uses which generates high volumes of trips: convenience stores, drive-in restaurant, automotive service station, or bank.
- g. **Parking.** Parking shall be governed pursuant to Section 9 of this Ordinance for retail establishments.
- h. **Permitting.** The Lynn City Council shall be the Special Permit Granting Authority.
- i. **Waivers.** The Lynn City Council may waive applicability of one or more of the requirements imposed by 935 CMR 500.000. The applicant shall be required to submit the request in writing and identify whether the waiver is from a provision in state law or local law. Any waivers from the state law should only be granted if said waiver was also approved by the Cannabis Control Commission under their waiver provisions available in 935 CMR 500.700. The following criteria can be used to request a waiver:
  - (A) Compliance would cause undue hardship to the requestor;
  - (B) If applicable, the requestor's non-compliance does not jeopardize the health or safety of any patient or the public;
  - (C) If applicable, the requestor has instituted compensating features that are acceptable to the Lynn City Council; and
  - (D) The requestor provides to the Lynn City Council written documentation, in a form and manner determined by the Lynn City Council, supporting its request for a waiver.

- j. **Hemp.** Nothing in this bylaw shall be construed to regulate the cultivation of industrial hemp, as same is regulated by the Massachusetts Department of Agricultural Resources pursuant to General Laws, Chapter 128, Sections 116-123. Use of land or buildings for hemp processing and/or product manufacture shall be subject to such zoning controls as apply to other (non-cannabis) processing and product manufacture operations.

## **Section 7. Medical Marijuana Treatment Centers**

Medical Marijuana Treatment Centers is hereby deleted from Section 5 Table of Use Regulations. The following language shall appear following the word “facility.” in the definitional Section 5.4 of “Retail Stores.” “Retail stores shall also include Medical Cannabis Treatment Centers which are establishments that acquires, cultivates, possesses, processes (including development of related products such as food, tinctures, aerosols, oils or ointments), transfers, transports, sells, distributes, dispenses or administers cannabis or products containing cannabis and/or related supplies for ostensibly medical purposes.

## **Section 8. Severability.**

If any provision of this Section is found to be invalid by a court of competent jurisdiction, the remainder of Section shall not be affected but shall remain in full force. The invalidity of any provision of this Section shall not affect the validity of the remainder of this zoning ordinance.





## City of Lynn, Massachusetts

CITY CLERK'S OFFICE  
Janet L. Rowe, City Clerk  
3 City Hall Square, Room 201  
Lynn, MA 01901

February 22, 2019

I, Janet L. Rowe, Clerk of the Lynn City Council, do hereby certify that copies of the within decision and all plans, if any referred to in the decision, have been filed with the Planning Board of the City of Lynn and the City Clerk of the City of Lynn, and the parties in interest have been notified of the within decision.

I, Janet L. Rowe, City Clerk of the City of Lynn, do hereby certify that 20 days have elapsed after the within decision was filed in the office of the City Clerk and no appeal has been filed.

*Janet L. Rowe*

Janet L. Rowe  
City Clerk  
Clerk of City Council

**Re: 193-195 Oxford Street**  
**Date Signed: February 12, 2019**  
**Appeal Date: February 22, 2019**



CITY OF LYNN, MASSACHUSETTS  
**LYNN CITY COUNCIL**  
2018-2019

Ward One	<b>Wayne A. Lozzi</b>
Ward Two	<b>Richard B. Starbard</b>
Ward Three	<b>Darren P. Cyr, President</b>
Ward Four	<b>Richard C. Colucci</b>
Ward Five	<b>Dianna M. Chakoutis</b>
Ward Six	<b>Frederick W. Hogan</b>
Ward Seven	<b>John M. Walsh, Jr.</b>



At- Large	<b>Buzzy Barton, Vice President</b>
At-Large	<b>Brian M. Field</b>
At-Large	<b>Brian P. LaPierre</b>
At-Large	<b>Hong L. Net</b>

**DECISION OF THE CITY COUNCIL OF THE CITY OF LYNN**

ON THE PETITION OF Lynn Organics, Inc. for a SPECIAL PERMIT PURSUANT TO THE LYNN ZONING ORDINANCE.

The Petitioner filed a petition with the City Council on December 7, 2018 for permission to "Operate a Recreational Cannabis Retailer on the Property".

The parcel of land to which this permission relates is known as 193-195 Oxford Street, collectively known as the "Property". The Property is located in the Central Business (the "CBD") Zoning District. A Special Permit from the City Council was sought by the petitioner.

At the time and place stated in the notice of the public hearing and after due notice was given to all persons entitled thereto, the public hearing was opened on January 22, 2019. The Council heard all those persons wishing to speak both for and against the petition.

On **January 22, 2019**, the City Council having received all pertinent data at and pursuant to the public hearing moved to GRANT the permission by a vote of TEN YES, ONE ABSENT, NONE OPPOSED, in accordance with General Laws, Chapter 40A with stipulations.

Ordered that Lynn Organics, Inc. have permission to operate a Recreational Cannabis Retailer at the Property located at 193-195 Oxford Street, with the following Stipulations:

1. Lynn Organics, Inc. providing a copy of its license to operate a Recreational Cannabis Retail Establishment from the Massachusetts Cannabis Control Commission in the City of Lynn.
2. Lynn Organics, Inc. providing a copy of its Operations Permit issued annually by the City of Lynn Board of Health.
3. Lynn Organics, Inc. executing a satisfactory Host Community Agreement with the City of Lynn.

## **CONTINUED DECISION OF THE CITY COUNCIL OF THE CITY OF LYNN**

4. Lynn Organics, Inc. providing a description of the security measures, including employee security policies, approved by the Massachusetts Cannabis Control Commission for the Recreational Cannabis Retail Establishment.
5. Lynn Organics, Inc. providing a copy of the emergency procedures approved by the Massachusetts Cannabis Control Commission for the Recreational Cannabis Retail Establishment.

## **DECISION OF THE CITY COUNCIL OF THE CITY OF LYNN**

The reasons for the GRANTING of said petition are as follows:

- a) The proposed use will be safe, attractive and appropriate for the area.
- b) No substantial burden will be placed upon the City for services.
- c) No detrimental impact on the City or the neighborhood can be envisioned.
- d) The proposed use will not derogate from the intent and purpose of the Zoning Ordinance of the City of Lynn but will enhance it.

Be advised that any party in interest or other person receiving this Notice of Decision wishing to appeal this decision shall do so pursuant to the provisions of General Laws Chapter 40A, Section 17.

Any such appeal must be filed within twenty (20) days after decision is filed in the City Clerk. No variances or special permit, or any extension, modifications, or renewal thereof, shall take effect until a copy the decision bearing the certification of the city or town clerk that twenty days have elapsed after the decision has been filed in the office of the city or town clerk and no appeal has been filed or that if such appeal has been filed, that it has been dismissed or denied and it is a variance or special permit which has been approved by reason of the failure of the permit granting authority or special permit granting authority to act thereon within the time prescribed and no appeal has been filed and that the grant of the application or petition resulting from such failure to act has become final or that if an appeal has been filed, that it has been dismissed or denied is recorded in the registry of deeds for the county and district in which the land is located and indexed and noted on the owner's certificate of title. The fee for recording or registering shall be paid by the owner or applicant.

**CITY COUNCIL OF CITY OF LYNN**

**ATTEST:**

  
Darren Cyr, President

  
Janet L. Rowe, City Clerk

Dated: February 12, 2019  
Appeal Date: February 22, 2019

## 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, Aidan O'Donovan, *(insert name)* attest as an authorized representative of Lynn Organics, LLC *(insert name of applicant)* that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on January 2, 2019 *(insert date)*.
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on December 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 December 26, 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 December 17, 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.

**Attachment A**  
**Newspaper Notice**





**Attachment B**  
**Municipal Notice**



RECEIVED  
CITY CLERK'S OFFICE

LEGAL NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-  
USE MARIJUANA ESTABLISHMENT PROPOSED BY LYNN ORGANICS LLC

Notice is hereby given that a Community Outreach Meeting for Lynn Organics LLC proposed Marijuana Establishment is scheduled for Wednesday, January 2<sup>nd</sup>, 2019 at 6:30pm at the Lynn Police Department Public Meeting Room, 300 Washington Street, 2<sup>nd</sup> Floor, Lynn, MA 01902. The proposed Marijuana Retailer is anticipated to be located at 195 Oxford Street, Lynn, MA. Community members will be permitted, and are encouraged, to ask questions and receive answers from representatives of Lynn Organics LLC.

A copy of this notice is on file with the City Clerk, City Council, Mayor's Office, and Planning Board, and a copy of this Notice was published in a newspaper of general circulation and mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the proposed Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred (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.

RECEIVED  
CITY COUNCIL

2018 DEC 26 P 2:47

2018 DEC 26 P 1:33

LYNN, MASS

2018 DEC 26 P 1:32

RECEIVED  
CITY CLERK'S OFFICE

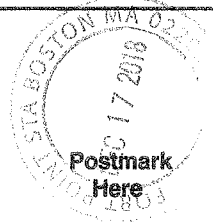
**Attachment C**  
**Abutter Notice**

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

USPS® ARTICLE NUMBER

9414 7266 9904 2138 7501 28

Certified Mail Fee	\$ 3.45
Return Receipt (Hardcopy)	\$ 2.75
Return Receipt (Electronic)	\$ 0.00
Certified Mail Restricted Delivery	\$ 0.00
Postage	\$ 0.68
Total Postage and Fees	\$ 6.88



Sent to: MORGAN MARY  
MORGAN DANIEL G  
P O BOX 172  
WOLFBORO, NH 03892

Reference Information

Michael Ross  
108459-001

PS Form 3800, Facsimile, July 2015

Return Receipt (Form 3811) Barcode



9590 9266 9904 2138 7501 21

1. Article Addressed to:  
MORGAN MARY  
MORGAN DANIEL G  
P O BOX 172  
WOLFBORO, NH 03892

2. Certified Mail (Form 3800) Article Number

9414 7266 9904 2138 7501 28

COMPLETE THIS SECTION ON DELIVERY

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



3. Service Type:  
☒ Certified Mail  
☐ Certified Mail Restricted Delivery

Reference Information

108459-001  
Michael Ross

PS Form 3811, Facsimile, July 2015

Domestic Return Receipt

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USE MARIJUANA ESTABLISHMENT PROPOSED BY LYNN ORGANICS LLC**

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A copy of this notice is on file with the City Clerk, City Council, Mayor's Office, and Planning Board, and a copy of this Notice was published in a newspaper of general circulation and mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the proposed Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred (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.

## *Lynn Organics LLC*

### **Plan for Positive Impact**

Lynn Organics LLC (the “**Company**”) is proposing to site a Marijuana Establishment in Lynn Massachusetts. Lynn is an area that have been identified by the Commission as an area of disproportionate impact. Accordingly, the Company intends to focus its efforts in Lynn (the “**Target Area**”) and on Massachusetts Residents who have, or have parents or spouses who have, past drug convictions.

In its first year of operations, the Company will implement the following goals, programs and measurements pursuant to this Plan for Positive Impact.

#### **Goals:**

The Company’s goals for this Positive Impact Plan are as follows:

1. Hire, in a legal and non-discriminatory manner, **25% of its employees** from the Target Area and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions;
2. Contribute a minimum of **thirty-five thousand and 00/100 Dollars (\$35,000.00)** **annually** to Prevention Werks of Lynn; and
3. Host semi-annual company volunteer outings with a goal of having a minimum of **ten (10) employees per event.**

#### **Programs:**

In an effort to reach the abovementioned goals the Company shall implement the following practices and programs:

1. In an effort to ensure it has the opportunity to interview, and hire, individuals from the Target Area and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions, the Company will post a notice at the municipal offices in Lynn for **three (3) months** prior to opening. The Company will also post **monthly notices** for **three (3) months** prior to opening in newspapers of general circulation in Lynn such as the **Lynn Daily Item.** The aforementioned notices will state that the Company is specifically looking for Massachusetts residents, who are 21 years or older, and have past drug convictions for employment.

Such residency, or prior drug conviction status, will be a positive factor in hiring decisions, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

2. In an effort to ensure that it will meet its charitable giving and volunteering goals, the Company will contribute a minimum of **thirty-five thousand and 00/100 Dollars (\$35,000.00)** annually to Prevention Werks of Lynn and encourage its employees to volunteer at Prevention Werks by providing such as **semi-annual paid volunteer days for at least ten (10) employees per event.**

## *Lynn Organics LLC*

Prevention Werks is a state grant managed through the City of Lynn to prevent substance misuse, addiction as well as to promote recovery through various modalities. Prevention Werks has stated that it will collaborate with the Company and accept donations and volunteers from the Company. Attached please find a letter from Prevention Werks confirming their willingness to work with the Company.

### **Annual Review**

The Company will annually review the following criteria in an effort to measure the success of its Plan to Positively Affect Areas of Disproportionate Impact:

1. Identify number of employees hired through its job development initiatives;
2. Identify the Company's total number of hours of volunteer time provided to local charities and community groups; and
3. Identify the Company's overall financial support provided to local charities and community groups.

The Company affirmatively states that it: (1) it has reached out to Prevention Werks of Lynn to confirm that they will accept donations and volunteers (as applicable) from the Company; (2) acknowledges and is aware, and 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; (3) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws and (4) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.

February 19, 2020

**Via Email Delivery**

Lynn Organics, Inc.  
Attn: Brandon Banks  
193-195 Oxford Street  
Lynn, MA 01901

Dear Brandon:

Prevention Werks of Lynn is looking forward to working with Lynn Organics, Inc. in various capacities in regards to substance misuse and addiction prevention. Prevention Werks will accept monetary donations and volunteers from Lynn Organics, Inc. and further acknowledges that it is aware that Lynn Organics, Inc. is seeking licensure as a Marijuana Retailer.

Prevention Werks has a positive impact on Lynn, MA, an area that has been identified as an area of disproportionate impact by the Massachusetts Cannabis Control Commission, by working with the residents of Lynn, MA to prevent substance misuse and addiction as well promoting recovery through various modalities. Prevention Werks is a state grant managed through the City of Lynn and is thrilled to collaborate with Lynn Organics, Inc.

Thank you,

A handwritten signature in black ink, appearing to read "M. Simons", with a long horizontal line extending to the right.

Michelle Simons MS, LADC I, CADC  
Prevention Coordinator  
617-549-1318  
3 City Hall Square  
Lynn, MA 01901



**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:** 001340870

**1. The exact name of the limited liability company is:** LYNN ORGANICS LLC

**2a. Location of its principal office:**

No. and Street: ONE INTERNATIONAL PLACE  
SUITE 3700  
 City or Town: BOSTON State: MA Zip: 02110 Country: USA

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

No. and Street: ONE INTERNATIONAL PLACE  
SUITE 3700  
 City or Town: BOSTON State: MA Zip: 02110 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:**

THE GENERAL CHARACTER OF THE BUSINESS OF THE LLC SHALL BE CULTIVATION AND SALE OF AGRICULTURAL PRODUCTS AND ANY OTHER BUSINESS IN WHICH A MASSACHUSETTS LIMITED LIABILITY COMPANY IS AUTHORIZED TO ENGAGE.

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

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

Name: JOHN F. BRADLEY  
 No. and Street: PRINCE LOBEL TYE LLP  
ONE INTERNATIONAL PLACE, SUITE 3700  
 City or Town: BOSTON State: MA Zip: 02110 Country: USA

**I, JOHN F. BRADLEY 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	NATURAL SELECTIONS MA, LLC	80.5 KINNAIRD STREET CAMBRIDGE, MA 02139 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

**9. Additional matters:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 10 Day of August, 2018,**  
**NATURAL SELECTIONS MA, LLC**

*(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 10, 2018 11:09 AM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$100.00

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

**Certificate of Amendment**

(General Laws, Chapter )

Identification Number: 001340870

The date of filing of the original certificate of organization: 8/10/2018

1.a. Exact name of the limited liability company: LYNN ORGANICS LLC

1.b. The exact name of the limited liability company *as amended*, is: LYNN ORGANICS LLC

**2a. Location of its principal office:**

No. and Street: ONE INTERNATIONAL PLACE  
SUITE 3700

City or Town: BOSTON State: MA Zip: 02110 Country: USA

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

4. The latest date of dissolution, if specified:

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

Name: JOHN F. BRADLEY  
 No. and Street: PRINCE LOBEL TYE LLP  
ONE INTERNATIONAL PLACE, SUITE 3700  
 City or Town: BOSTON State: MA Zip: 02110 Country: USA

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	NATURAL SELECTIONS MA, INC.	80.5 KINNAIRD STREET CAMBRIDGE, MA 02139 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:

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code

9. Additional matters:

10. State the amendments to the certificate:

6. AMEND NAME OF MANAGER

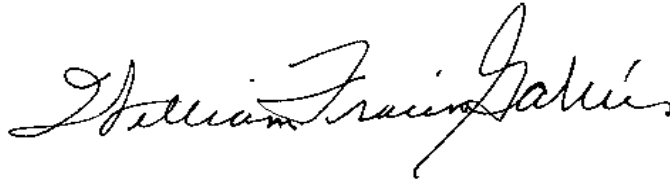
11. The amendment certificate shall be effective when filed unless a later effective date is specified:

**SIGNED UNDER THE PENALTIES OF PERJURY, this 26 Day of October, 2018,**  
**NATURAL SELECTIONS MA, INC. , Signature of Authorized Signatory.**

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:

October 26, 2018 10:10 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*

# LYNN ORGANICS LLC

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## OPERATING AGREEMENT

A Massachusetts Limited Liability Company

**THIS OPERATING AGREEMENT** of Lynn Organics LLC (the “**Company**”) is made effective as of the 11<sup>th</sup> day of August, 2018 by and between Natural Selections MA, LLC as the initial Manager of the Company (the “**Manager**”), and the person executing this agreement as the sole member of the Company (the “**Member**”).

**NOW THEREFORE** the Member, the Manager and the Company agree as follows:

### ARTICLE 1 - DEFINED TERMS

Section 1.1 **Definitions.** In addition to the terms defined elsewhere in this Agreement, the terms defined in this Article shall, for the purposes of this Agreement, have the meanings herein specified.

(a) “**Act**” means the Massachusetts Limited Liability Company Act, as the same may be amended from time to time (M.G.L. c. 156C).

(b) “**Certificate**” means the Certificate of Organization of the Company and any and all amendments thereto and restatements thereof filed on behalf of the Company pursuant to the Act.

(c) “**Code**” means the United States Internal Revenue Code of 1986, as amended from time to time, or any corresponding Federal tax statute enacted after the date of this Agreement.

(d) “**Person**” includes any individual, corporation, association, partnership (general or limited), joint venture, trust, estate, limited liability company, or other legal entity or organization.

(e) “**Profits**” or “**Losses**” means, for each fiscal year, an amount equal to the Company’s taxable income or loss for such fiscal year, determined in accordance with Section 703, 704 and 705 of the Code (but including in taxable income or loss, for this purpose, all items of income, gain, loss or deduction required to be stated separately pursuant to Section 703(a)(1) of the Code), with such adjustments as are required by the Code or are deemed necessary or desirable by the Manager.

(f) “**Regulations**” means the income tax regulations, including temporary regulations, promulgated under the Code, as such regulations may be amended from time to time (including corresponding provisions of succeeding regulations).

### ARTICLE 2 - FORMATION AND TERM

Section 2.1 **Formation.** The Member and the Company agree to form the Company as a limited liability company pursuant to the provisions of the Act, and agree that the rights, duties and liabilities of the Members shall be as provided in the Act, except as otherwise provided herein. The Manager shall execute, deliver and file the Certificate and any and all amendments thereto and restatements thereof.

Section 2.2 **Term.** The term of the Company shall commence on the date the Certificate is filed with the Massachusetts Secretary of State’s Office, and shall continue until the Company is dissolved in accordance with the provisions of this Agreement and the Act.

Section 2.3 Registered Agent and Office. The Company's registered agent and office shall be Aidan O'Donovan, 80.5 Kinnaird Street, Cambridge, Massachusetts. At any time, the Manager may designate another registered agent and/or registered office.

Section 2.4 Principal Place of Business. The principal place of business of the Company shall be located at One International Place, Suite 3700, Boston, MA 02110. At any time, the Manager may change the location of the Company's principal place of business.

Section 2.5 Purpose. The purpose of the Company shall be cultivation and sale of agricultural products, and to engage in any all business in which a Massachusetts limited liability company is authorized to engage.

### **ARTICLE 3 - MEMBER**

Section 3.1 Powers of Member. The Member shall have no power with regard to the management of the Company except pursuant to the express terms of this Agreement.

Section 3.2 Distributions. Distributions to the Member shall be made as, if and when the Manager determine(s) that such distributions are appropriate in his/her /their sole discretion.

### **ARTICLE 4 - CAPITAL ACCOUNTS, CONTRIBUTIONS AND ALLOCATIONS**

Section 4.1 Capital Accounts. A Capital Account shall be established and maintained for the Member. The Capital Account of the Member shall be maintained in accordance with Code Section 704(b) and the regulations issued thereunder. The Member has made a Capital Contribution to the Company and shall have initial Capital Account balances equal to the amount of his/her/its Capital Contribution.

Section 4.2 Profits and Losses. Profits and losses shall be allocated in a manner complying with the requirements of Code Sections 704, 705 and 706 and the Treasury Regulations thereunder.

Section 4.3 Member's Interest. The Member has no interest in specific Company property, unless and until distributed to such Member.

Section 4.4 Status of Capital Contributions. The Member shall not be required to lend any funds or make Capital Contributions to the Company or to make any additional Capital Contributions to the Company.

### **ARTICLE 5 - MANAGEMENT**

Section 5.1 Management of the Company. The Company shall be managed exclusively by the Manager. The Manager shall have full, sole and exclusive and complete discretion, right, power, and authority to manage, control and make all decisions affecting the business and affairs of the Company and to do or cause to be done any and all acts, at the expense of the Company on the terms provided herein, deemed by the Manager to be necessary or appropriate to effectuate the business, purposes and objectives of the Company as set forth in this Agreement. The Manager, with the consent of the members, may amend this Agreement. A Manager may resign by giving at least five (5) days written notice to all of the Members. A Manager may be removed by the Member by an instrument in writing.

Section 5.2. Limitation Of Liability. Except to the extent that the Massachusetts General Laws prohibits the elimination or limitation of liability of Managers for breaches of fiduciary duty, no Manager shall be personally liable to the Company or its members for monetary damages for any breach of fiduciary duty as a Manager, officer or agent of the Company, notwithstanding any provision of law imposing such liability. No amendment to or repeal of this provision shall apply to or have any effect on

the liability or alleged liability of any Manager for or with respect to any acts or omissions occurring prior to such amendment.

Section 5.3 Indemnification. The Company shall, to the fullest extent permitted by law, indemnify any Manager made, or threatened to be made, a party to an action or proceeding, whether criminal, civil, administrative or investigative, by reason of being a Manager, officer or agent of the Company or any predecessor entity, provided, however, that the Company shall indemnify any such director or officer in connection with a proceeding initiated by such Manager, officer or agent only if such proceeding was authorized by the Members of the Company.

(a) The indemnification provided for in this Section 5.3 shall: (i) not be deemed exclusive of any other rights to which those indemnified may be entitled under this Agreement or any other agreement or vote of members or disinterested managers or otherwise, both as to action in their official capacities and as to action in another capacity while holding such office, (ii) continue as to a person who has ceased to be a Manager, officer or agent of the Company, and (iii) inure to the benefit of the heirs, executors and administrators of a person who has ceased to be a Manager, officer or agent of the Company. The Company's obligation to provide indemnification under this Section 5.3 shall be offset to the extent of any other source of indemnification or any otherwise applicable insurance coverage under a policy maintained by the Company or any other person.

(b) Expenses incurred by a Manager, officer or agent of the Company of the Company in defending a civil or criminal action, suit or proceeding by reason of the fact that he or she is or was a Manager, officer or agent of the Company shall be paid by the Company in advance of the final disposition of such action, suit or proceeding upon receipt of an undertaking by or on behalf of such Manager, officer or agent of the Company to repay such amount if it shall ultimately be determined that applicable law requires that he or she not be indemnified by the Company. Notwithstanding the foregoing, the Company shall not be required to advance such expenses to a Manager, officer or agent of the Company who is a party to an action, suit or proceeding brought by the Company that alleges willful misappropriation of corporate assets, disclosure of confidential information or any other willful and deliberate breach by such Manager, officer or agent of the Company of his or her duty to the Company or its members.

(c) The foregoing provisions of this Section 5.3 shall be deemed to be a contract between the Company and each Manager, officer or agent who serves in such capacity at any time while this Agreement is in effect, and any repeal or modification thereof shall not affect any rights or obligations then existing with respect to any state of facts then or theretofore existing or any action, suit or proceeding theretofore or thereafter brought based in whole or in part upon any such state of facts.

Section 5.4 Reliance by Third Parties, Apparently Authority. Any person dealing with the Company may rely on a certificate signed by the Manager as to any of the following: (i) the identity of the Members and Manager hereunder; (ii) the existence or nonexistence of any fact or facts which constitute conditions precedent to acts by the Manager or the Members or are in any other manner germane to the affairs of this Company; (iii) whether a specified Person is authorized to execute and deliver any instrument or document of the Company; (iv) the authenticity of any copy of this Agreement and amendments thereto; or (v) any act or failure to act by the Company or as to any other matter whatsoever involving the Company or any Member or Manager.

## **ARTICLE 6 - BOOKS AND RECORDS**

Section 6.1 Books and Records. At all times during the continuance of the Company, the Company shall maintain at its registered office and principal place of business all records and materials the Company is required to maintain at such location under the Act.

## **ARTICLE 7 - DISSOLUTION, LIQUIDATION AND TERMINATION**



Section 7.1 Events Causing Dissolution. The Company shall be dissolved and its affairs shall be wound up upon the occurrence of any of the following events: (a) upon the election of the Member; (b) the entry of a decree of judicial dissolution under the Act; or (d) the sale or disposition of all or substantially all of the property of the Company.

Section 7.2 Liquidation. Upon dissolution of the Company, the Manager shall carry out the winding up of the Company and shall immediately commence to wind up the Company's affairs; provided, however, that a reasonable time shall be allowed for the orderly liquidation of the assets of the Company and the satisfaction of liabilities to creditors so as to enable the Members to minimize the normal losses attendant upon a liquidation. The Company shall terminate when all of the assets of the Company, after payment of or due provision for all debts, liabilities and obligations of the Company, have been distributed to the Members in the manner provided for in this Article and the Certificate has been cancelled in the manner required by the Act.

*[REMAINDER OF PAGE LEFT INTENTIONALLY BLANK; SIGNATURE PAGE FOLLOWS]*

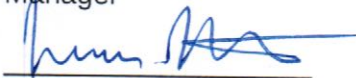
IN WITNESS WHEREOF, the parties hereto have executed this Agreement to be effective as of the date first above written.

**MEMBERS:**

**Natural Selections MA LLC**

By:   
Name: Aidan O'Donovan  
Title: Manager

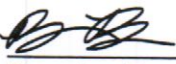
By:   
Name: Brandon Banks  
Title: Manager

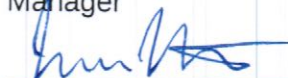
By:   
Name: Isador Mitzner  
Title: Manager

**MANAGER:**

**Natural Selections MA LLC**

By:   
Name: Aidan O'Donovan  
Title: Manager

By:   
Name: Brandon Banks  
Title: Manager

By:   
Name: Isador Mitzner  
Title: Manager



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

mass.gov/dor

Letter ID: L0774865792  
Notice Date: April 19, 2019  
Case ID: 0-000-780-066



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



LYNN ORGANICS, LLC  
1 INTERNATIONAL PL STE 3700  
BOSTON MA 02110-3214

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

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

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

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

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

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

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

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

William Francis Galvin  
Secretary of the  
Commonwealth

April 23, 2019

TO WHOM IT MAY CONCERN:

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

**LYNN ORGANICS LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 10, 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:  
**NATURAL SELECTIONS MA, INC.**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **NATURAL SELECTIONS MA, INC.**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **NONE**



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

## *Lynn Organics LLC*

### **Plan for Obtaining Liability Insurance:**

Lynn Organics LLC (the “**Company**”) will work with an insurance broker licensed in the Commonwealth of Massachusetts to obtain insurance that meets or exceeds the requirements set forth in 935 CMR 500.105 (10).

Pursuant to 935 CMR 500.105(10) the Company shall obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, or such amount as otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Pursuant to 935 CMR 500.105(10)(b) if the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will place in escrow (the “**Liability Insurance Escrow Account**”) a sum of no less than Two Hundred and Fifty Thousand and 00/100 (\$250,000.00) or such other amount approved by the Commission, to be expended for coverage of liabilities. If the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will properly document such inability through written records that will be retained in accordance with the Company’s Record Retention Policy (incorporated herein by reference). If the Liability Insurance Escrow Account is used to cover such liabilities, it will be replenished within ten (10) business days of such expenditure.

The Company will submit reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

This policy may also be referred to by the Company as the “**Liability Insurance Policy**”.

**Lynn Organics LLC**  
**Business Plan**  
**Revised as of October 5, 2019**

# **Section I**

## **Company Overview**

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## Executive Summary

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Lynn Organics LLC (the “**Company**”) is a Massachusetts-based company committed to serving cannabis customers in the City of Lynn, Massachusetts (the “**City**” or “**Lynn**”). The Company is founded by established entrepreneurs in the cannabis space committed to providing access to quality natural cannabis on the basis of scientific research and development. Previous to incorporating in Massachusetts, members of the Company’ team have successfully owned and operated a dispensary in Colorado (“**Natural Selections, Colorado**”), which has emerged as a leading cannabis organization with a strong reputation for its commitment to scientific research and development, community involvement, and high-quality, safe, and consistent products. The Company has set forth the following objectives in establishing its organization:

- 1) A compliant operation in good standing with regulators and all regulations,
- 2) Safe, consistent and effective products of the highest quality,
- 3) Commitment to serving and educating customers, and
- 4) Commitment to scientific research and development.

The Company has assembled a team of experienced professionals excited to dedicate their business and cultivation expertise to produce cannabis in Massachusetts. The team is led by Aidan O’Donovan, an experienced cultivator and cannabis business owner. The Company plans to build collaborative relationships with state and local governments to ensure a seamless integration into the community it serves. The Company has demonstrated a commitment to philanthropy and plans to partner with local civic and community organizations that promote public health within the Lynn community. Additionally, the Company will establish ongoing community dialogues in order to provide transparency about its operations and education about the responsible use of cannabis.

The team has extensive experience operating a safe and compliant dispensary. Founder Aidan O’Donovan is also the founder of Natural Selections, Colorado, a dispensary in Northglenn, Colorado. Mr. O’Donovan and his partner, Brandon Banks, will lead the team in all elements of developing, implementing, and maintaining a cannabis operation. With regard to cultivation, Mr. Banks has extensive knowledge related to environmental control, indoor agricultural lighting mechanisms, media and nutrient additives, post-harvest processing and quality control, and optimal strain selection. Mr. O’Donovan has been working in the Colorado cannabis industry since 2010. Prior to co-founding Natural Selections, Colorado, Mr. Banks cultivated and bred several award-winning cannabis strains while working as the Master Grower for Green Man Cannabis. He was featured in the book, *Big Weed*, as a cultivation expert. Mr. Banks has a wealth of business and financial expertise from his time working in the cannabis industry.

Mr. O’Donovan and Mr. Banks will be responsible for matching the needs of customers while ensuring that the operation is in compliance with all regulations. Their experience will also be critical to establish the business operations in a timely fashion to ensure that local residents have access to the dispensary as quickly as possible.

The Company is committed to operating a highly secure and compliant dispensary in Lynn. To this effect, the Company has engaged Dan Linskey, the former Superintendent-in-Chief of the Boston Police Department and current Managing Director of Kroll Investigations and Disputes as a security consultant. Mr. Linskey led the Boston Police Department through some of the most tragic and contentious events in the city’s history, including the Boston Marathon bombings and the Occupy Movement. He has strong relationships with local law enforcement agencies



throughout Massachusetts and Lynn, and will help to further the Company's commitment to security as well as a seamless integration into the Lynn community.

The team believes that the Company will be instrumental in helping to create a strong cannabis industry in Massachusetts, where citizens are guaranteed safe and secure access to cannabis in a manner compliant with all state and local regulations.

## **Introduction to Business**

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The Company intends to design and develop the dispensary while prioritizing efficiency, safety, community, and future development. The Company is committed to creating a sense of community through its dispensary, which will create a shared sense of responsibility among customers and employees. To this effect, the Company will invest in a spacious and inviting design to ensure that customers feel comfortable within the dispensary and have sufficient time to discuss all questions and concerns with dispensary agents.

In addition to creating an inviting establishment for its customers, the Company is committed to implementing extensive security measures that will comply with all state and local regulations. The Company has significant experience operating in a highly secure environment and is committed to designing a space where prevention and deterrence will be achieved by means of physical security prevention, electronic security, and operational security measures. The Company is committed to providing extensive training, information, and resources to its employees so that they are prepared to prevent, report, deter, and when appropriate, react and respond to any violence should that occur on the premises. Dan Linskey will provide valuable guidance and consulting services to the team in designing and developing a secure dispensary and cultivation facility (as applicable).

The Company has developed its business plan based on three (3) commitments: high-quality products, product transparency, and high standards for cannabis cultivation, and processing.

### **1) High Quality Products**

The Company is committed to providing its customers with high quality cannabis and the Company's team has taken a scientific approach to strain development, aggregating data based on customer feedback and carefully studying plant and terpenoid profiles.

Although the Company intends to focus on recreational sales, it has studied the medical conditions eligible for treatment under current regulations and intends to provide an array of cannabis products best suited to treat these conditions.

### **2) Product Transparency**

The founders of the Company are committed to transparent and ethical business practices and understand that these practices are particularly essential within the cannabis industry.

The Company will only offer quality, lab tested products. The Company guarantees that all batches of cannabis are tested at a certified laboratory for potency, terpenes, metals, pesticides, and microbials, as well as THC/CBD content. The results of these tests will be displayed on the packaging of all products. As per the regulations, information is placed describing our nutrients,

pesticides, ingredients, and recommendations on methods of intake, dosing, batch information and contact information.

*See Section VII “Best Practices” for more information regarding the Company’ Standard Operating Procedures Regarding Quality Control and laboratory testing.*

Dispensary agents will be trained to explain the significance of laboratory testing results, so they can make accurate recommendations based on a customer or patient’s specific ailments and needs.

The Company will provide extensive educational materials in its dispensary as well as on its website. Its website will have an extensive research and development (“R&D”) section that posts information on all strains produced along with current testing results.

### **3) Best Practices for Cultivation, Processing, & Manufacturing**

The Company is committed to maintaining high standards of production throughout all elements of cannabis cultivation and processing. Chief Operating Officer Brandon Banks will lead the team in managing, tending, and cultivating the plants throughout all stages of the cultivation and dispensing process. Mr. Banks has extensive experience in developing, implementing, and maintaining standard operating procedures for cannabis cultivation and dispensing facilities. *The Company’ Standard Operating Procedures are explained in detail in Section VII “Best Practices & Standard Operating Procedures.”*

The Company intends to emulate its cultivation strategies at its cultivation facility in Colorado. In contrast to a perpetual harvest cycle, The Company uses a 4-week cycle in which a different flower room is cut down every week. The Company separates flowering rooms based on the unique needs of each strain group. This strategy prevents the early harvest of immature plants and mitigates many common problems that are associated with strains growing in non-ideal environments. Cannabis grown at the cultivation facilities will be inspected thoroughly to ensure the medicine is free of pathogens and contaminants. Plants will be cultivated with the highest quality, lab tested, state approved fertilizer and pesticides to prevent potential carcinogens and residual contaminants from being consumed. The Company strives to have minimal impact on the environment and on plants. The Company utilizes as few chemicals as possible and uses clean salt-based nutrients that are extremely low in heavy metal content. These practices ensure the overall quality of finished product.

### **Description of Project**

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The Company has identified 193 Oxford Street, Lynn, MA 01901 (the “**Property**”) as an ideal location in which to establish its Marijuana Retailer (the “**Facility**”).

The Facility will be located in the City of Lynn, where there are approximately 287,000 residents living in the area and the surrounding regions.

The Property will be made safe and secure through reinforced construction materials and technology, cameras and remote monitoring, and on-site security personnel. The Facility will include various security and safety equipment and technology, including but not limited to secure entry port, or access control vestibules, computer verified patient or caregiver entrance protocols, and redundant security alarms and controls. In addition, all personnel will be trained extensively, and the operation will fully comply with Massachusetts guidelines.

## **Project Timeline**

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Contingent on its approval from the City, the Company has allocated ninety (90) days for the construction period. Major construction milestones have been outlined below. When appropriate, these construction processes will occur concurrently. The Company will work diligently with its team of architects, engineers, and construction workers to ensure that the development of the facility is completed as quickly as possible.

<b>Milestone</b>	<b>Expected Start Date</b>	<b>Time Frame (Days)</b>	<b>Expected Completion Date</b>
<b>Exterior Construction</b>			
Building exterior/facade improvements	10/14/19	14	10/28/19
Landscaping and vegetation perimeter	1/6/20	21	1/27/20
Security camera installation	1/20/20	7	1/27/20
<b>Interior Construction:</b>			
Interior demolition	9/9/19	35	10/14/19
Interior framing	10/4/19	7	10/11/19
Drywall	12/9/19	7	12/16/19
HVAC	11/11/19	28	12/9/19
Flooring	12/16/19	7	12/23/19
Finishing work	12/23/19	14	1/6/20
Installation of furniture & fixtures	1/06/20	14	1/20/20
Installation of security systems, alarms systems, doors vaults, and cameras	1/20/20	7	1/27/20

# **Section II**

## **Security Plan**

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## General Security Plan

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The Company has significant experience operating in a highly secure environment and is committed to implementing extensive security measures to protect customers, employees, and the general public. The Company has designed an extensive security plan that will comply with all state and local regulations. Prevention and deterrence will be achieved by means of physical security prevention measures, electronic security measures, and operational security measures. The Company is committed to providing extensive training, information, and resources to its employees so they are prepared to prevent, report, deter, and when appropriate, respond to any threat to security that could occur on the premises.

This security plan outlines four major tenants of security:

- General Security Plan (architectural, electronic, and operational)
- Secure Transportation Plan
- Anti-Diversion Plan
- Anti-Loitering Plan

Dan Linskey, security consultant from Kroll Security, will lead the Company in designing and developing a secure dispensary. Widely respected for his knowledge of the complexities inherent in law enforcement and homeland security, Mr. Linskey has also consulted with numerous national and international government agencies on a broad range of challenges, including large-scale event management, crisis leadership, and preparedness and community engagement strategies.

The Company intends to design its dispensary based on the security principles of Crime Prevention Through Environmental Design (“**CPTED**”), Concentric Circles of Protection, and Integrated Design. Collaboratively, these security prevention measures focus on evaluating opportunities to deter a threat from entering and circulating within the building envelope. CPTED is a concept that utilizes planned passive resources such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements to reduce vulnerability to crime. The key concepts of CPTED include:

- Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space
- Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility.
- Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders. This sends the message that would-be-offenders will be identified.

The concept of “Concentric Circles of Protection” is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements, becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders or other unauthorized individuals.

The Integrated Design Philosophy establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When

the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for using this concept is that architectural, operational and electronic elements must be implemented to complement one another; thereby creating collaboration between them that results in a strong security program. No one element of the group can stand-alone or operate independently and provide adequate protection. Specifics of the elements used include:

- Architectural Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, and control barriers.
- Operational Security measures address items such as staff and public access control, staffing, monitoring and administration of systems.
- Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.

Security measures for the Facility consist of both physical barriers and electronic systems that work in concert to provide a robust security program. These measures include:

- Secure Door and Window Hardware
- Security Mesh
- Primary Intrusion Alarm System
- Backup Intrusion Alarm System
- Video Surveillance System
- Access Control System
- Entry & Exit Door Interlock System

### **Architectural Security Prevention Measures**

To prevent armed violence, the Company will focus on implementing measures minimizing undue attention and implementing a redundant system of barriers, perimeter intrusion detection systems, surveillance, and active patrolling.

### **Electronic Security Prevention Measures**

The Company will implement a number of electronic security measures designed to prevent, deter, and detect unauthorized intrusion, violence, and the use of firearms at the dispensary or related facilities. As per the regulations, the Company will implement access control and alarm monitoring, video surveillance, and security communications, utilizing commercial grade equipment. The Company will ensure all security system equipment and recordings are maintained in a secure location to prevent theft, loss, destruction, and alterations.

### **Alarm Monitoring**

Intrusion detection for the dispensary is comprised of two independent commercial-grade alarm systems – a primary and a backup – to ensure an intrusion will be detected and reported should a failure of either system occur. The primary alarm system (“**PAS**”) and the backup alarm system (“**BAS**”) will be installed, serviced and monitored by separate and unrelated security vendors to ensure redundancy.

Perimeter detection of an intrusion is provided using door contacts on all operable perimeter doors and windows and glass break detection for all exposed perimeter glass. Interior intrusion detection is provided by motion detection in the sales area, an office and the LAA. In addition to intrusion devices, hold-up/panic alarms are provided at each point of sale register location within the sales area, in each office and in the LAA.

Fixed panic alarms are located in areas where incidents would more likely to take place including reception areas, sales areas, storage rooms and staging areas. Employees will be trained at the location points of these alarm systems.

The intrusion alarm systems will be controlled by numeric keypad arming stations located inside the entry and exit doors. Keypads will display system armed/disarmed status, status of security devices and any trouble notifications. Authorized users will be issued unique arm/disarm codes to identify which employee armed or disarmed the systems at a given time.

As per the current regulations, a duress alarm function will be provided at each PAS and BAS arming station to notify law-enforcement that an authorized user has been forced by an intruder to disarm an alarm system.

The PAS and BAS are provided separate detection of intrusion for all perimeter door and window contacts, glass break detectors and motion detectors to ensure a device failure on one system will not compromise intrusion detection by the other. Both systems will have backup batteries for continued operation during power failures.

### **Access Control**

In an effort to mitigate theft and unauthorized intrusion, the Company will keep all cannabis and cannabis products in a limited access area inaccessible to any persons other than dispensary agents, with the exception of displays allowable under current regulations. During non-business hours all cannabis will be stored in a locked, access-controlled space in a limited access area within the dispensary. The Company's safe and vault for cash will be located in a restricted access area.

A Limited Access Area means a building, room, or other indoor or outdoor area on the registered premises of a dispensary where marijuana, MIPs, or marijuana by-products are cultivated, stored, weighed, packaged, processed, or disposed, under control of a dispensary, with access limited to only those dispensary agents designated by the dispensary.

These limited access areas will be accessible to only specifically authorized personnel, which shall include only the minimum number of employees essential for efficient operation.

All limited access areas within the dispensary must be clearly identified with a sign no smaller than 12" x 12" which states: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only" in lettering no smaller than 1 inch in height. Each facility must prominently display security system and time-lock safe notification signage.

A numeric keypad access control system ("ACS") will be provided at the LAA door to limit access to those issued a keypad code. Each person authorized to enter the LAA will be issued a unique personally identifiable numeric code, which when used, will be logged by the ACS by user code. The keypad will be managed by a separate controller such that damaging or tampering

with the keypad will not unlock the LAA door. The ACS controller will be located in the LAA and be provided with backup power supply to ensure operation during a power failure. Only limited authorized personnel have access to keys. Only specifically authorized personnel have access to security measures, such as passwords and combinations.

### **Video Surveillance System**

The video surveillance system (“VSS”) is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of video. VSS head-end equipment will be located in the LAA to ensure access is highly restricted. Cameras will be located around the exterior perimeter of the Company’s tenant space to record activity in nearby driveways, parking areas and the building perimeter; at entry and exit doors to record and identify all who enter or exit the dispensary; and areas where controlled products will be stored, processed, handled and sold.

The VSS will record cameras for a minimum of ninety (90) days and retain (at minimum) the last twenty-four (24) hours for immediate retrieval and playback. The VSS will to save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will be provided with an uninterruptible power source for continued operation during a power failure.

### **Operational Security Prevention Measures**

It is imperative that all employees and departments are committed to upholding the Company’s security policies. The most effective way to ensure the safety and security of employees, customers, patients, and caregivers is utilizing preventative methods.

The Company understands the importance of training dispensary agents to ensure that they are able to perform the following: 1) execute all necessary security protocols designed to prevent, detect, and deter violence or armed robbery, 2) report suspicious behavior or threats to security, and 3) respond appropriately, utilizing security alarms and notification systems, in an emergency situation.

### **Closing & Opening Procedures**

The opening and closing periods of the day present high-risk times for armed robbery or unauthorized intrusions. To ensure that all employees and dispensary agents are safe, the Company will implement the following procedures to be followed at the opening and the ending of each day:

- The Company will ensure that there are two employees present for the opening, closing, and during the operation of the dispensary. Upon opening, employees will inspect the business for forcible entry and survey the premises.
- Security equipment will be inspected each day, after opening and prior to closing the dispensary. This will ensure that the security equipment maintains proper surveillance of the dispensary.
- After closing, employees will inspect the premises for persons hiding in the business or near the building’s entrance.



## **Cash Management Security**

Each dispensary agent employee handling cash must be familiar with the types of related incidents related to cash management and is required to handle cash in accordance with Cash Management and Accounting procedures. Cash must be secured in a biometric money safe separate from cannabis product. The vault will be kept in the LAA.

Department managers shall notify law enforcement when a potential risk is identified. Dispensary agents will be trained to identify suspicious activity from coworkers, customers, vendors, as well as unidentified persons. Suspicious behavior could include:

- 1) Any question regarding cash reserves, closing times, volume in business or sales, the amount of money kept in the dispensary,
- 2) Loitering in the vicinity of the dispensary or cultivation facility, or
- 3) Any questions regarding location of cash or internal security measures.

Employees will be required to report all security system failures, incidents of diversion, or infractions to their direct managers immediately upon occurrence. Security system failures could include any alarm activation that requires response by local law enforcement, video failure, any acts of diversion, any destruction of cannabis in a manner that is not compliant with the Company's waste disposal plan.

### **3) Employees will be trained to respond to situations involving armed robbery or violence.**

Employees will be trained to respond appropriately in an emergency situation, specifically in a situation:

1. Upon discovery of a crime, incident of diversion, or breach of security, authorities will be immediately notified with as much information and details as possible.
2. The Company's management will work with and cooperate with authorities providing any requested information or documentation as soon as possible.
3. An official report will be provided to the Cannabis Control Commission (the "CCC") identifying all marijuana and marijuana product that has been damaged or taken during the event. The report will be given no later than 10 days after the crime transpired, but all efforts will be made to make it as soon as practicable.
4. All documentation related to incident that is reportable pursuant to Massachusetts laws will be maintained by the facility for no less than one year and made available to all relevant authorities upon request.
5. The facility will obtain, at its own expense, a security system audit by a vendor approved by the CCC, on an annual basis. Audit reports will be submitted to the CCC no later than 30 days after the audit is conducted. If issues are identified, the facility will submit a plan to mitigate the concerns within ten (10) business days of submitting the audit report.

## **Secure Transportation Plan**

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The Company understands the risks associated with transporting recreational and medical

cannabis and has designed an extensive security plan to ensure the safety of its employees and of the residents of the City. The Company's founders and key staff have extensive experience transporting cannabis products from through their experience operating Natural Selections, Colorado. The Colorado operation strictly enforces all security protocols and procedures and to-date has had no instances of theft, diversion, or armed robbery. Mr. O'Donovan and Mr. Banks will work closely with the management and security teams to develop, implement, and enforce all elements of this secure transportation plan.

The Company has designed secure transportation procedures that are highly compliant with all state and local regulations.

Cannabis will only be transported from the cultivation facility to the dispensary in secure vehicles. Only CCC-certified dispensary agents will be eligible to transport marijuana from the cultivation facility to the dispensary. The agents will receive extensive training to ensure that they are highly familiar with the regulations and all of the Company's Standard Operating Procedures regarding transportation.

The Company will ensure that each transport vehicle is staffed with a minimum of two dispensary agents. At least one dispensary agent shall remain with the vehicle at all times that the vehicle contains marijuana. Transportation vehicles will be non-descript white vans with no labels or symbols related to possession or ownership of cannabis or the Company's business name. Secure transport vehicles will be equipped with the following: a GPS system, heat and air conditioning suitable for marijuana and marijuana products, an alarm system, a dashboard camera, and a video surveillance camera. Each vehicle will also have a Bluetooth phone and a two-way digital radio to ensure that the transportation agent shall have access to a secure form of communication with personnel at the sending site at all times that the vehicle contains marijuana.

Transport routes will be randomized. The Security Director and Chief Operating Officer must check current road conditions (including weather, traffic, and road closures) and approve the route prior to the transportation. The Security Director will be responsible for monitoring "security risk geographies" by monitoring local crime rates and political and legal conditions that could cause additional risks for cargo theft. Any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport will be reported to the Department and local law enforcement within 24 hours, pursuant to the regulations.

### **Guidelines for Shipping/Transport Manifests**

Prior to transporting any cannabis or cannabis products, an authorized agent must perform the following steps:

- a. Weigh, inventory, and account for on-video all marijuana to be transported prior to it leaving the origination location;
- b. After products have been released for transport, an authorized agent at the cultivation facility will log into Flow Hub to develop an electronic manifest connected to the transport for retention by the origination location. The transportation agent will carry a copy of this manifest with the products being transported. When developing the manifest, the agent will select the packages that are being shipped from the "Inventory Control" option. Once the items are selected, the agent will record all the following information:
  - Names and registration information for transportation agent.

- Receiving licensed entity's name, address, and registration number.
  - Date and timestamps related to the transport.
  - Description of the marijuana or MIPS being transported.
  - Weight of marijuana or MIPS being transported.
  - Mileage of the transporting vehicle at origination, at its destination, and the mileage back to its original destination.
  - Signature from the cultivation agent creating the package as well as the transportation agent. The transportation agent must sign a disclaimer starting that he or she is not authorized to handle cannabis or cannabis-infused products beyond the secured transport.
- Upon arrival at the dispensary, an authorized dispensary agent must re-weigh, re-inventory, and account for on video all marijuana transported, within eight hours after arrival at the destination dispensary. The agent will log into Flow Hub and compare the electronic manifest to the manifest presented by the transportation agent. The following information will be checked and confirmed:
    - Names and registration information for transportation agent.
    - Receiving licensed entity's name, address, and registration number.
    - Date and timestamps related to the transport.
    - Description of the marijuana or MIPS being transported.
    - Weight of marijuana or MIPS being transported.
    - Mileage of the transporting vehicle at origination, at its destination, and the mileage back to its original destination.
    - Signature from the cultivation agent creating the package as well as the transportation agent.

The agents will be responsible for documenting and reporting any unusual discrepancy in weight or inventory to the Department and local law enforcement within 24 hours.

Upon arrival at an ISO-registered lab, an authorized laboratory employee agent will sign the manifest produced to the manifest delivered by the transportation agent to acknowledge receipt. The Company will retain all shipping manifests for no less than one year and make them available to the Department upon request.

The Company will also implement and enforce the following secure transportation procedures:

- Any vehicle used to transport marijuana must have a secure, locked storage compartment that is part of the vehicle. The transportation manager must ensure all transportation vehicles are compliant prior to authorizing a transfer to the vehicle.
- All products shall be suitably packaged in accordance with the regulations to protect it from alteration, contamination, damage during storage, and handling and shipping. All products will be packaged in tight, light-resistant containers and stored at controlled room temperature (unless otherwise indicated). All cannabis products will be separated based on the specific product and placed in a secure, tamper evident bag. Each tamper evident product bag is placed in a commercial grade bin, which is then closed with a lid that is secured on all four corners with tamper evident zip ties. The secure bin ensures that no

product is handled or tampered with during the delivery. Cannabis products will be not visible from outside the vehicle.

- Once the shipping bin is inside the vehicle for transport, the bin is strapped down using commercial grade straps to ensure the bin experiences no movement during transport. Before the transportation agent leaves the licensed premise with the medical cannabis product, a member of management inspects the transportation vehicle for proper security of the bin.
- Any vehicle transporting marijuana shall travel directly to the receiving dispensary and shall not make any stops. In case of an emergency stop, a detailed log must be maintained describing the reason for the event, the duration, the location, and any activities of personnel exiting the vehicle.
- The Company will inform the appropriate law enforcement authorities and the Department within twenty-four (24) hours if any of the following incidents occur during transportation of cannabis.
  - (a) Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving the dispensary or a dispensary agent;
  - (b) Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;
  - (c) Unauthorized destruction of marijuana;
  - (d) Any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, personal caregivers, or dispensary agents;
  - (e) An alarm activation or other event that requires response by public safety personnel;
  - (f) The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and
  - (g) Any other breach of security.

The Company will implement the following policies for its transportation agents:

- Each dispensary agent shall carry his or her Department-issued registration card at all times when transporting marijuana and shall produce it to the Department's authorized representative or law enforcement official upon request in compliance with the current regulations
- Each transportation agent is required to double check for forms of identification approved by the Department before transporting any cannabis.
- All authorized transport agents are required to have a current, valid government-issued driver's license. Prior to transport, a copy of the driver's license is made and filed under the shipping licensee's folder in the inventory control system for compliance. Valid means the license is not expired, revoked or voided in anyway. Temporary identification is not an acceptable form of identification.
- All transportation agents will be required to wear plain clothing with no reference or symbols related to possession or ownership of cannabis. The Company will provide each transport agent with a plain white t-shirt to wear as a uniform after he or she has completed the training process.

The Company will also implement and enforce the following security procedures related to secure transportation:

- All transport vehicles are registered with the state as required by law. Prior to transport, a photocopy of the registration is attached with the electronic manifest for proof of registered authorized transport in the event the driver is pulled over by a governing authority. In addition to photocopying the registration, it is scanned into the file of registered drivers related to the associated licensed entity's profile on the Company's inventory control network, or if it is a driver employed directly by the Company, in their employee file for compliance. In addition to having the registration, all license plates display the required sticker identifying the vehicle as properly registered. Management confirms the stickers are in place on the license before releasing items for transport.
- All vehicles that are used for transport are required to be insured by law. To ensure this happens, before all transports, a photocopy of all required paperwork is exchanged between the dispensing and receiving licensed entity. In addition, that copy is scanned into the associated licensed entity's profile on the Company's inventory control network for reference for each transport. Management verifies that a copy has been made and filed for compliance. This includes calling the company providing insurance to confirm that the vehicle owner has kept up with all necessary payments for the insurance to remain valid. All of these documents are available for the Department to review upon request.
- All vehicles will be well maintained and serviced regularly.

### **Anti-Diversion Plan**

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The Company understands the high risk associated with cultivating and dispensing cannabis, which is a controlled substance with many incentives for diversion. The Company intends to implement extensive security measures to prevent cannabis from being diverted

The Company is committed to curbing diversion and the distribution of cannabis and cannabis products to other states by implementing the following procedures and protocols:

- **Preventing employee theft, diversion, and pilferage** by enforcing strict chain of custody and inventory control procedures, building a strong employee culture with a shared sense of responsibility, and implementing and patrolling a state-of-the-art security and surveillance system.
- **Preventing theft via negligent or improper waste disposal.** The Company is committed to monitoring, recording, and securing the destruction of all cannabis, cannabis products, and cannabis plant material in an adequate manner pursuant to the regulations.

### **Preventing employee theft, diversion, and pilferage**

The Company understands that the majority of financial and product loss in the cannabis industry occurs due to employee theft. There are many ways employees could divert cash or product from a cannabis business that could lead to revenue from the sale of marijuana going to criminal enterprises, gangs, and cartels.

- **Pilferage.** Employees can report lower harvests and steal cannabis flower.
- **Theft.** Employees can steal cash or finished products from the vault.
- **Sales manipulations.** Employees can provide unauthorized discounts or manipulate the Point of Sale database
- **Assisted Robberies.** Dispensary employees could provide internal security protocols and information to assist in robberies of cannabis businesses.

The Company is committed to curbing diversion and preventing revenue from the sale of cannabis from going to criminal enterprises, gangs, and cartels trafficking through the following procedures:

- Building a strong employee culture with a shared commitment to anti-diversion policies.
- Enforcing strict chain of custody and inventory control procedures, and
- Implementing and patrolling state-of-the-art surveillance system.

### **Strong Employee Culture**

The Company understands the importance of creating a culture in which employees have a shared commitment to preventing diversion and are strongly incentivized to report any incidents of diversion or suspicious behavior. Key personnel will be responsible for training all staff and will encourage a culture of responsibility in all efforts to prohibit improper diversion of cannabis products.

At its current facility in Colorado, the Company's management team has allocated substantial resources towards implementing a strong business culture with clearly defined expectations and guidelines for employees. The Company's executive management team strives to build a personal relationship with every employee and create a transparent environment with a shared feeling of responsibility towards the Company's core values. The Company prioritizes the following strategies in creating a strong employee culture, so employees feel woven into the business's culture and highly committed to the future of the organization:

- **Transparency.** Employees will be encouraged to offer feedback and strategic feedback, regardless of their level or position in the Company.
- **Benefits, training, and paid-time off.** The Company will offer each employee benefits, training, and opportunities for career advancement.
- **Employee Empowerment.** The Company is committed to building a culture centered on employee development and education. Employees will be encouraged to solve problems, ask questions, manage tasks, and provide input and suggest new policies and processes
- **Organizational design.** The Company will design thoughtful strategies for communication, performance indicators, performance evaluations, and division of responsibilities that will be implemented at all levels of the business.

Implementing business practices to create a strong culture and empowering environment for employees is highly correlated with the prevention of turnover and in turn, reduces theft and diversion. Industry security experts suggest that employees who are able to view their position as a career, rather than a short-term retail job will be more invested in ensuring the success of the Company and less willing to risk being terminated and losing their benefits. The Company's management team has had great success with these practices at its current facility in Colorado.

The Company has been extremely successful at encouraging employees to report incidents of diversion, as well as combating theft and pilferage.

The Company is committed to establishing a culture of responsibility among its employees regarding the diversion of cannabis and cannabis products. The Company believes that it is imperative that all departments and managers partake in some elements of supply chain management and anti-diversion tasks. All administration, dispensary, cultivation, manufacturing, and operations personnel will be encouraged to offer recommendations to the Chief Operating Officer regarding anti-diversion policies and other strategies.

### **Employee Screening**

The Company has extensive experience in building a strong business culture and understands that it begins with the initial hiring process. The Director of Human Resources will develop and implement the procedures to recruit, screen, interview, hire, in-process and integrate new employees.

Human Resources will develop and implement the procedures to recruit, screen, interview, hire, in-process and integrate new employees. Such procedures will include, but are not limited to:

- 1) Reviewing resumes and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth.
- 2) Performing and recording reference checks on qualified candidates including:
  1. Verification of address and education.
  2. Verification of former and current employment.
- 3) Recording information from former supervisors on the candidate's performance, if available.
- 4) Performing a criminal background check on the selected candidate to determine eligibility and to identify any other possible disqualifying items.

The Human Resources team will conduct background checks on all candidates prior to final hiring decision to verify the information provided by the candidate and identify any high-risk attributes. The team will ensure completed and signed releases are obtained to allow the Company to conduct criminal and credit background checks. Moreover, dispensary agents must be over the age of 21 and are otherwise legally employable in cannabis enterprises. Any dispensary agent that is discovered to have a history of theft or diversion based on a Criminal Offender Record Information (“**CORI**”) report must not be given access to cannabis products.

Management personnel will undergo more extensive screening and will be required to provide fingerprinting and submission for a Level II background check.

The Human Resources team is responsible for archiving and safeguarding all employee data and confidential information. Additionally, all employees will sign a waiver advising them about the twenty-four (24) hour surveillance program and that they will be video recorded in accordance with state and local laws and regulations.

## **Employee Training Program**

The Company has created an extensive training plan designed to prevent, deter, and detect theft and diversion from employees. This training program is also designed to foster a culture of responsibility and to encourage employees to report any suspicious behavior from customers, patients, caregivers, and fellow employees. Each employee will be required to successfully complete this training prior to any specified job training. Managers will be required to complete additional training to understand more specifically how to uphold our anti-theft and anti-diversion plan as part of the initial agent training.

### ***1) Identifying regions of dispensary and facility***

New employees will be given a tour of the facility and will be provided extensive training regarding the identification of areas of prevention throughout the Facility. All employees will be expected to understand and identify limited access areas, restricted access areas, and storage areas located within the cultivation facility and dispensary

- Access control effectively limits the ability for employees to move freely throughout the facility.
  - As referenced above, a LAA means a building, room, or other indoor or outdoor area on the registered premises of a dispensary where marijuana, MIPs, or marijuana by-products are cultivated, stored, weighed, packaged, processed, or disposed, under control of a dispensary, with access limited to only those dispensary agents designated by the dispensary. Restricted Access Areas are LAAs where only management personnel are allowed.
  - These controlled access areas will be accessible only to specifically authorized personnel, which shall include only the minimum number of employees essential for efficient operation.

This aspect of the plan diminishes the capability of a wrongdoer to identify vulnerabilities and plan an illicit activity. The errant entry alert feature that cues the Security Director of attempts at unauthorized entry also serves to highlight potentially suspicious behavior on the part of individual employees and may prompt a follow-up interview and corrective training.

### ***2) Best Practices***

The training will also cover operational practices designed to prevent and deter diversion and prevent the sale of cannabis from going to criminal enterprises, gangs, and cartels. All employees will be required to understand that these methods of preventing diversion will be a shared responsibility among all departments.

Managers are held to higher standards than other employees due to their responsibilities related to security checks. Managers are shadowed for a one-month period as they perform anti-diversion activities, such as performing internal document audits, checking the video surveillance system for suspicious activity, and proper enforcement of all anti-diversion practices. At the end of the month, based on observation and evaluation of duties, all members of upper management decide on the new manager's qualifications. Any new manager who does not meet all qualifications is assigned to another member of management for additional shadowing or kept as a standard agent.



The following outlines general best security practices that the Company will implement to prevent diversion, which could lead to the cannabis products or revenue going to criminal enterprises, gangs, and cartels:

- Operating, opening, and closing procedures are strictly enforced. Two employees are required for opening, closing, and operation of all dispensary facilities.
  - An employee must inspect the business for forcible entry before entering the business and survey the premises before admitting others.
  - Security equipment must be inspected after opening and prior to closing to ensure the necessary surveillance of all operating activities.
  - At closing, employees must survey the premises for someone hiding in the business or near the building entrance.
- Employees will abide by restricted use of electronic devices (cell phones, music players, cameras, etc.) within the Facility. Personal cell phone use will be limited to the break area and if carried, kept in a Company issued, enclosed pouch, suspended on a neck lanyard that will also display the employee I.D.
- Employee bags will be restricted in size and subject to random security checks by on site security personnel.
- The general manager shall regularly review information from external sources including law enforcement, trade and patient associations, advocacy groups, and patients and caregivers related to factors that may impact the incentive for diversion (i.e. system-wide marijuana shortages, changes in law, rapidly increasing patient registrations, etc.). If the general manager concludes a change in diversion risk based on environmental factors, a risk mitigation plan must be developed and implemented.
- Each day, the security team will review security footage from the previous shift to ensure theft has not taken place. Employees will be informed that they are accountable for every aspect of production that they are involved in, and that it is recorded by the video surveillance system.

### **3) *Reporting Diversion***

All employees will be trained to report any diversions, theft, or suspicious behavior to their supervising manager.

Employees will be trained extensively in regard to identifying diversion issues in a classroom setting. During the initial training, all prospective agents will be given a demonstration and tested to identify the following infractions:

- Cannabis or cannabis product in an open access area,
- A break in the chain of custody,
- A missing element to production documentation,
- An unlabeled door sign,
- An uncertified scale.

To pass this exam, agents are expected to correct all of these errors. This training will ensure that employees understand how to identify how and where to properly secure cannabis, what needs to be completed with documentation, what type of access should be identified using the door sign, and how to check if a scale is certified.

After receiving this training, employees will be instructed regarding how to report a diversion. Reporting incidences against other employees as they occur is expected to ensure that the Company's anti-diversion plan is working effectively.

- If an agent has committed an act of diversion or infraction in the chain of custody, he or she will be expected to report the incident report directly to his or her manager and reconcile the error.
- If an agent discovers that a fellow employee has committed an act of diversion or infraction in the chain of custody, the agent shall be expected to report to the manager on duty. The agent will be responsible for reporting all aspects of diversion applicable to the situation, such as lack of documentation, theft, lack of secured storage, etc. The manager will then proceed to communicate with the negligent employee and take the necessary action.
- If an agent recognizes that there is any discrepancy in inventory in the cultivation, harvest, or phase, he or she will be expected to report to a manager as soon as it has been identified, as well as document the miscount on any internal inventory documents.
- If an agent notices cannabis or cannabis-infused product improperly stored, the agent is expected reconcile the error, store the product safely, and notify his or her manager.

During this course, agents are informed of potential possible consequences related to not following standard operating procedures that can contribute to diversion.

- An agent who has committed a first-time offense for breaking the chain of custody or not reporting an incident of diversion will be issued a strike. His or her respective manager shall be required to complete a write-up citing the details of the infraction, the time and date of the occurred infraction, and the necessary actions taken to correct the error. The grow agent will also be expected to re complete the initial employee training program.
- An employee with three write-ups for the same reason is terminated based on lack of understanding of compliance.

The following infractions will provide grounds for immediate termination:

- Proven theft via video surveillance,
- Improper storage that results in an infraction against the business license,
- Using a fellow agent's identification on any internal documents.

## **Chain of Custody & Inventory Management**

The Company will emulate its current inventory control system from its existing Colorado facility, which entails a series of comprehensive policies and procedures to ensure a clear chain of custody and accountability for all aspects of inventory and recordkeeping.

The Company will use Flow Hub inventory control system that tracks plants from seed to final product via a chain-of-command barcode system. This inventory system will chronicle every step, ingredient, activity, transaction, and dispensary agent who handles, obtains, or possesses the product.

The Company will stay up-to-date on all developments within the cannabis industry that could affect the incentive for diversion. (i.e. system-wide cannabis shortages, changes in law, etc.) Based on these developments, the Company will evaluate and revise its security policies to mitigate the risk for specific incidents of diversion.

The Company is also committed to building strong relationships with local law enforcement agencies to combat trafficking both interstate and internationally. The Company will take its status as a dispensary seriously and will be committed to reporting any diversions or other reportable incidents to the Lynn Police Department within twenty-four (24) hours of occurrence.

## **Dispensing Limits**

The Company will also work to ensure customers do not divert cannabis obtained through its dispensary by ensuring that they only procure the amount of cannabis legally allowed. This will ensure that customers do not have access to more cannabis than necessary and that customers do not have access to additional cannabis that could be sold or distributed to persons under age 21. The Company will strictly limit the amount of cannabis dispensed to each customer pursuant to the regulations.

## **Secure Waste Disposal Methods**

The Company understands the risk associated with negligent waste disposal methods, which can potentially lead to diversion and distribution to consumers or non-registered patients outside of the state. The Company will emulate its waste disposal strategies at its current facility in Colorado, which have been designed to prevent theft from occurring after the necessary disposal of cannabis and contaminated cannabis products. The Company is committed to monitoring, recording, and securing the destruction of all cannabis, cannabis products, and cannabis plant material in an adequate manner compliant with state and local regulations.

The Company is committed to educating all agents on the importance of proper waste disposal methods and the risks and dangers associated with not following these procedures. The manager will be responsible for upholding all waste management policies and performing regular checks to ensure that no incidents of diversion have occurred. Agents will receive extensive training regarding waste disposal methods and will be expected to uphold these policies as well.

See Waste Disposal Plan in Section VII: “Best Practices & Standard Operating Procedures” for a detailed discussion on the waste disposal policies that the Company plans to implement to prevent the risk of waste theft and diversion.

## **Anti-Loitering Plan**

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The Company understands the risks presented by person's under 21 loitering outside of the Facility, especially in regard to law enforcement's first priority of safety related to cannabis. The Company is committed to preventing the illegal distribution of cannabis and intends to implement a number of preventative designs, surveillance, and operational strategies to deter loitering. The Company is committed to forming partnerships with surrounding businesses, members of the community, and local government officials to create an environment surrounding its dispensary and ancillary facilities in which loitering problems do not arise.

The Company will implement security measures in regard to the following categories that will identify and prevent the loitering of minors in a legal and non-threatening manner:

- 1) The Location of the Premises
- 2) The Design of the Premises
- 3) Video Surveillance and Anti-Loitering Techniques
- 4) Marketing and Advertising

The Company understands that even the strongest preventative methods may not deter certain types of individuals from loitering. To this effect, the Company is committed to forming partnerships with the Lynn Police Department as well as other local agencies and organizations to implement strategies to solve any potential loitering or security issues that arise. Security personnel will be on the site of the dispensary at all times to remove individuals not complying with the regulations or other offending behavior.

### **The Location of the Premises**

The Company has chosen a location for its dispensary that is highly compliant with all regulations. The dispensary, which is located at 193-195 Oxford Street, Lynn MA, is not situated within 500 feet of a school, daycare center or any facility in which minors commonly congregate. Its neighbors will be industrial or commercial businesses and food establishments seeking to serve the employees of these industrial businesses. The Company specifically chose this location, as it is a significant distance from any area that would be considered to be at risk for the congregation of minors.

- The Company will work closely with surrounding businesses to ensure that they are informed of all preventative design and surveillance systems that the Company will need to implement for security and anti-loitering purposes.
- Currently, there are no benches, chairs or other areas of "rest" that may attract loiterers or cause minors to congregate within the immediate vicinity of the dispensary. The Company understands the increased risk of loitering and congregating around structures, such as benches, awnings that offer protection from weather, and public ashtrays. The Company will work closely with local government officials to ensure that no such objects will be added to the immediate premises surrounding the dispensary.
- The Company will also ensure that there is no litter or garbage in the area surrounding its storefront. All of its waste will be securely disposed in an adequate manner compliant with state and local regulations. The Company's Waste Disposal Plan is described in detail in Section VII: "Best Practices & Standard Operating Procedures."

## **The Design of the Premises**

The Company will implement appropriate design strategies and surveillance systems that will identify and prevent loitering among minors. The Company intends to integrate seamlessly into its surrounding area and is aware that loitering or security issues could impact other local businesses as well.

The Company understands that many of the most common issues with loitering around retailers are caused by a lack of defined boundaries.<sup>1</sup> When designing the premises of its dispensary, the Company will ensure that its dispensary has proper boundaries and borders in order to minimize the potential of loiterers. The Company is committed to creating natural vegetative boundaries around the perimeter and if necessary, will entertain the idea of installing a fence or secure perimeter to limit access.

Lighting is a critical design measure to prevent loitering. The surrounding streets around the dispensary have sufficient lighting to illuminate the dispensary's parking lot and surrounding area. The dispensary itself will be illuminated with motion-sensor lights, as indicated on the Site Plan. Lighting will be consistent to reduce contrast between shadows and illuminated areas. The lighting system will use timers or photoelectric cells to turn lights on at dusk and off at dawn. The system will also use motion sensors to turn lights on when motion is detected but will avoid lighting areas surrounding the dispensary so that people should not use at night. If the loitering of minors becomes an issue, the Company will consider installing "pink lighting," which has been utilized by police departments across the world to deter minors from congregating.

The Company is committed to complying with regulations in regard to creating a safe, neutral exterior that in no way promotes or advertises the sale of cannabis.

- The Company will create and maintain a neutral design for its exterior, logo, and signage.
- The signage outside of the dispensary will only be illuminated 60 minutes prior to the dispensary's closing and there will be no neon signage that may attract potential loiterers.

## **Landscape Design**

The Company has consulted an architectural landscape designer to determine how to best create an external environment that is inviting to customers and patients but is a deterrent to loiterers and minors. The Company understands that loiterers commonly seek out overgrown foliage, vegetation, bushes or other points that obstruct them from view in order to engage in illicit activities. The Company will consider planting "hostile vegetation", as defined below, in the landscape areas surround the dispensary to create an unreceptive atmosphere that does not interfere with a client's experience. "Hostile vegetation" refers to plants such as crown of thorns, Russian olive, red barberry, or Siberian pea shrub. The Company will also plant vegetation, with prickly leaves or thorns like bougainvillea in areas immediately surround the dispensary.

The Company will be committed to eliminating any existing vegetation that blocks a loiterer from the dispensary's video surveillance cameras.

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## **Video Surveillance & Anti-Loitering Techniques**

The Company will implement an extensive security surveillance camera system to detect and deter loiterers. Many security experts claim that the presence of a camera is often sufficient to deter loiterers; however, the Company will also consider implementing a number of other creative design efforts to detect and deter minors from surrounding the dispensary.

### **Video Surveillance System**

The Company will utilize its security system to identify minors and prohibit loitering in the area. The VSS, as defined above, will record outside of the dispensary in addition to inside the premises. The Company will ensure that potential loiterers are aware that a video surveillance system is recording their actions and will eliminate any foliage or other coverings that could conceal a person from the surveillance system.

The video surveillance system is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of video. VSS head-end equipment will be located in the LAA, as defined above, to ensure access is highly restricted. Cameras will be located around the exterior perimeter of the Company's space to record activity in nearby driveways, parking areas and the building perimeter; at entry and exit doors to record and identify all who enter or exit the dispensary; and areas where controlled products will be stored, processed, handled and sold.

The VSS will record cameras for a minimum of 90 days and retain (at minimum) the last 24 hours for immediate retrieval and playback. The VSS will save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will be provided with an uninterruptible power source for continued operation during a power failure.

The Company will employ a contracted security service. These security personnel will be responsible for detecting, observing, recognize, identify, deter, report, and when appropriate, reporting, loitering to the local law enforcement agencies.

### **Signage**

Posting "no loitering" signs has also been shown to have the desired effect in preventing unauthorized from loitering in an area. While businesses or private residences may not always be able to remove persons loitering in an area, placing clear "no loitering" signs can often have the desired effect of minimizing loitering. In general, most individuals are not aware of loitering laws and therefore simply installing these signs or having an employee regularly walk around a building's exterior can deter individuals from residing in an area.

### **Anti-Loitering Devices**

The Company took great precautions when considering the location for its dispensary to prevent loitering. However, the Company will consider implementing additional preventative measures should loitering become an issue around the premises of the dispensary. The Company understands that creating an atmosphere that is unappealing to minors will also assist in efforts to prevent the illegal distribution of cannabis to minors. Therefore, the Company will do everything to ensure that loitering does not occur.

- **Playing classical music.**<sup>2</sup> Security officials have reported that classical music can be a strong deterrent for the loitering of minors in a particular area. If the Company notices that minors have begun to loiter around the dispensary, they will consider installing a protected speaker that will be mounted at least 10 feet above grade. These speakers will play classical music or other sounds that have been shown to discourage minors from loitering in an area.
- **The Mosquito.**<sup>3</sup> The Company will stay abreast on new developments and devices designed to discourage loitering. If the Company faces challenges with minors loitering outside of its dispensary or in the surrounding premises, they will consider purchasing a security device known as “The Mosquito,” which schools and other spaces use in areas where minors tend to congregate after hours. The Mosquito is a sound device emits an unpleasant but benign high-pitched sound that only young people can hear. This noise is not audible to older people due to presbycusis: an age-related hearing loss, which gradually prevents people from hearing high frequencies as they get older. This device has been used to both keep young people safe and to prevent minors from congregating in unsafe areas.

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<sup>2</sup> Journal of Popular Music Studies, Volume 19, Issue 4, Pages 342–358

<sup>3</sup> The Mosquito <sup>TM</sup> Copyright © 2012.Moving Sound Tech.

## **Section III**

# **Business & Marketing Plan**

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## **Business Operations and Marketing Plan**

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The Company is an organization committed to providing access to quality natural cannabis on the basis of science research and development. The Company's founders currently operate and manage Natural Selections, Colorado which has emerged as a leading cannabis organization in Colorado with a strong reputation for its commitment to utmost quality care for its clients. The Company has set forth the following objectives in establishing its organization:

- 1) A compliant operation in good standing with regulators,
- 2) Safe, consistent, and effective products of the highest quality,
- 3) Commitment to serving and educating patients, customers, and caregivers, and
- 4) Commitment to scientific research and development.

The Company will emulate Natural Selections, Colorado's marketing strategy and build a strong brand rooted in education, community involvement and participation, and a rigorous commitment to scientific research and development. The Company is committed to utilizing logos, signage, and packaging that are compliant with all regulations and reflect its commitment to natural, quality products. The Company intends to integrate seamlessly into Lynn's community and will identify charitable partners to partner with to support the community and improve the surrounding areas.

### **Logo, Signage, & Packaging**

The Company is committed to utilizing tasteful branding strategies that are aligned with its values and compliant with regulations. The Company has chosen its name, "Lynn Organics," to reflect its commitment to providing high quality, natural plant-based cannabis to its customers and patients. The Company's brand reflects the medicinal chemical compounds found in cannabis plants, rather than the cannabis plant itself. As per the regulations, the Company will not utilize symbols, images of marijuana, related paraphernalia, and colloquial references to cannabis and marijuana in any of its branding materials.

### **Packaging**

The Company will invest in packaging based on brand reliability, transparency and quality that is in compliance with the regulations. Each product will be contained in simple packaging that is opaque and tamper or child-resistant. In the interior, there will be a label describing nutrients, pesticides, ingredients, and recommendations on methods of intake, dosing, batch information and contact information. All products also must have labels on them, detailing the potency, the types of chemicals used in cultivation and other information.

### **Education**

In lieu of traditional business marketing and advertising strategies, the Company will utilize extensive educational materials, seminars, and campaigns to educate customers regarding the use of cannabis. The Company will begin its marketing efforts with a grassroots campaign to educate customers about the effects of cannabis, methods of consumption, as well as cannabinoids and their associated benefits.

The Company's website will have extensive information about the Company's mission, research, strains, and testing results from registered labs. Customers will be able to access a list of current

cannabis strains and products available at the dispensary. The company will also provide an extensive database with links to articles from trusted sources such as PubMed and GW Pharmaceuticals about scientific development in the cannabis field. The team has strong relationships with cannabis-related research groups throughout the country and will stay abreast regarding developments in the field.

The Company's website will also contain specific information about cannabinoids and their associated benefits. The Company intends to aggregate data based on customer feedback and carefully studying plant and terpenoid profiles to provide its customers with as much information as possible. The Company will refrain from making any statement, design, representation, picture, or illustration related to the safety or efficacy of marijuana unless supported by substantial evidence or clinical data with reasonable scientific rigor, which shall be made available upon the request of the Commission.

The Company has allocated a sufficient budget to invest in Search Engine Optimization to ensure that qualified consumers are able to access their content on the web. The Company will also invest in written materials and handouts to educate employees and customers on methods of consumption, dosage, and types of cannabinoids and their associated effects. The Company is committed to providing the utmost quality care to its customers and educating employees and customers on all potential side effects.

The educational materials will provide information on the following:

### **1) Methods of cannabis consumption**

#### **Inhaling cannabis**

Customers may elect to inhale cannabis by packing a small amount of dried flower into a pipe or rolling paper or utilizing a vaporizer. Customers will be advised to begin with a portion of the prescribed dose of cannabis and then, if necessary, increase the amount while taking note of how the cannabis affects their body. Customers should note that they may experience side effects such as coughing and irritation of the throat. Customers will be informed to use caution when inhaling cannabis and to try a different product or strain of cannabis if they experience any negative side effects.

When inhaling cannabis

- Take short, shallow breaths
- Slowly increase dosage and keep note of how the product interacts with the body

#### **Orally Administered Cannabis-Infused Products**

Consuming cannabis-infused products affects customers differently than inhaling cannabis. These products can affect consumers differently depending on their weight, metabolism, diet/nutrition, and experience or history of cannabis use. The Company will recommend that when consuming food-based cannabis, tinctures, or capsules, consumers begin by consuming ¼ of their recommended dosage. Beginning with a portion of the recommended dose is the best way for a consumer to learn how a strain of cannabis or a specific food-based product interacts with their body. After an hour, the consumer can increase their dosage in increments remaining aware of the effects. If a consumer feels any negative side effects, they can try a

different product or strain of cannabis that may result in less side effects. Employees will make this information clear and available to each customer.

## **Topical & Transdermal Treatment of Cannabis**

Topical and transdermal methods are often chosen by patients who want the therapeutic benefits of marijuana without the cerebral euphoria associated with other delivery methods. Cannabis-infused lotions, salves, oils, sprays, and other transdermal methods of relief work by binding to a network of receptors called CB2. These topical and transdermal treatments can be applied directly to the skin.

### **2) Dosage**

The employees will help the customer determine the correct dosage based on the prescription from the patient's medical practitioner and the customer's experience with cannabis. The employees will provide the following general recommendations to each customer:

- **Start slowly.** It is recommended to begin by consuming a small portion of the prescribed dosage and to monitor how cannabis interacts with the body.
- **Inhaling Cannabis.** Wait between short inhalations for a few minutes to observe the strength of the product. Begin with ¼ of prescribed dose and note how the product affects the body.
- **Edible products.** When eating cannabis or consuming cannabis-infused products, allow the product an hour to interact with the body before it begins to take effect. Wait four hours before taking a second dose. Consumers who are new to edible products should begin with a dose that is less than 0.5 ml to gauge how the product affects their body.
- **Determine dosage amount based on prescription and the mg of THC in each product.** Divide the product up accordingly to the prescribed dose. If it is your first time using the product divide the dosage into ¼ of the prescribed amount in order to gauge its effects.
- **Self-titration.** Self-titration is the best way to determine the best product and dosage. When using a new product begin with a low dosage, less than the prescribed amount, and see how it interacts with the body. Always take note of the environment, method of consumption, and amount consumed in order to determine side effects and how cannabis affects the body.

The Company will also offer educational materials on the following subjects: cannabinoids and their associated benefits, cannabis side effects & safety, biochemistry and physiology, and nutrition/diet.

## **Commitment to Rigorous Scientific Research**

The Company has taken a scientific approach to strain development, aggregating data based on customer and patient feedback and carefully studying plant and terpenoid profiles. The Company believes that rigorous scientific testing should be the base formula for all future development. The Company is commitment to producing strains with the presence of cannabinoids including THC, CBD, CBG, CBC, and THC-V.

The Company is committed to a rigorous testing policy and has established partnerships with certified laboratories to gain an understanding of the cannabinoid profiles and terpene levels in all produced strains and cannabis-infused products. Additionally, the Company utilizes an HPLC to isolate cannabinoids to produce ratio-specific products. The Company understands that each individual's body physiology is unique and certain products and strains affect recreational consumers and patients' in different ways. There is little known research behind CBG, CBC and several other compounds that could lead to treatment for other ailments.

Similar to the unknown cannabinoids, terpenes, which are unsaturated hydrocarbons, are found within the essential oils of the plant and vary depending on strain, have been associated with medical benefits. The Company will not restrict its research to cannabinoids and is committed to performing extensive research and testing on terpene profiles as well.

The Company is committed to sharing its scientific research with its customers, patients, caregivers, and all members of the community. The research team will work closely with the Community Outreach Director to coordinate the publishing of its research through its website, blog, and printed materials. The research team and Community Outreach Director will also organize ongoing community events and dialogues to provide transparency and knowledge about cannabis with the community.

### **Commitment to Quality Care**

The Company understands that a strong brand begins in providing utmost quality care to its customers. The team hopes that The Company can be instrumental in building a strong cannabis industry in Massachusetts, where customers and patients are guaranteed safe access to cannabis and education. The core of the Company's branding strategy lies in building strong relationships with customers... The Company believes in personally interacting with all of its customers and helping design treatment plans that are uniquely catered to them.

The Company has considered its commitment to its customers through the design process of the dispensary. The Company will invest in a spacious and inviting design to ensure that customers will have sufficient time and space to make their decisions. The Company will employ enough dispensary agents to ensure that each customer leaves the dispensary after a positive personal encounter and a strong plan to utilize the cannabis and cannabis infused products safely. Each dispensary agent will be trained to ask certain questions to understand the customer's objectives and experience in previously using cannabis.

Dispensary agents will offer each customer a wealth of information regarding the available cannabis strains and cannabis-infused products, cannabinoids and their associated benefits, risks and adverse side effects associated with cannabis, and various methods of consumption. The dispensary agents will also inquire about customer's nutrition, diet, and lifestyle to ensure that the recommended consumption method and dosage is appropriate. All dispensary agents will be trained to explain the potency of different products and recommend that the smallest amount possible should be tested initially and increased conservatively until the desired effect is achieved.

The Company has an open policy with all clients and will welcome constructive criticism to encourage positive change throughout the Facility.

## **Community Involvement**

The Company plans to build collaborative relationships with state and local governments to ensure a seamless integration into the community it serves. The Company has demonstrated a commitment to philanthropy and plans to partner with local organizations and non-profits that promote public health within Lynn.

The Company has developed a thorough plan for positive impact addressing its community involvement in Lynn. Please see the Plan for Positive Impact for additional information.

## **Section IV**

# **Benefits & Effects on the City of Lynn**

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## **Fiscal & Community Impact on the City of Lynn**

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The Company is committed to benefiting the City of Lynn through community and fiscal impact. The Company will be committed to contributing to the Lynn economy by providing residents of Lynn with full-time jobs with competitive salaries, healthcare, and benefits.

The Company has demonstrated a commitment to philanthropy and plans to partner with local civic and community organizations that promote public health within the Lynn community. Additionally, the Company will establish ongoing community dialogues and seminars in order to provide transparency about its operations and education about the responsible use of cannabis.

- **Employment:** The Company seeks a seamless integration into the Lynn community and intends to hire qualified local residents with a proven work ethic and interest in educational development, as well as experience and skills relevant to the required duties of each position. Initially, the Company will hire approximately 20 full-time employees to fully staff its dispensary operations. These wages and salaries will increase as the business grows. The Company will offer its employees competitive salaries and will provide benefits, such as healthcare, social security, workers' compensation, life insurance, and a 401K plan.
- **Community Charitable Contributions:** The Company plans to build collaborative relationships with state and local governments in order to ensure a seamless integration into the community it will serve. The Company has demonstrated a commitment to philanthropy and plans to partner with local organizations and non-profits that promote public health within Lynn. Team members will also organize community outreach efforts, such as trash pick-up events, to create a safer, cleaner city as well as provide transparency about their operations and education about the responsible use of cannabis.

## **Job Creation for the City of Lynn**

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The Company is an equal opportunity employer and seeks qualified candidates aligned with its core mission of building a compliant operation in good standing with regulators and producing safe, consistent cannabis products of the highest quality. The Company seeks a seamless integration into Lynn's community and intends to hire local residents with a proven work ethic and interest in educational development, as well as experience and skills relevant to the required duties of each position.

The Company is committed to ensuring that dispensary operations are staffed appropriately to remain in compliance with state law and department regulations, while simultaneously providing the highest quality of care to its customers and patients. Initially, The Company will hire approximately twenty (20) full-time employees. The Company will also employ a contract security service to ensure redundancy in staffing and to partially segregate the security staff from the overall employee population. The Company will be seeking candidates to fill the following positions:

<b>Dispensary</b>	
Customer Coordinator	1
Dispensary Manager	2-4

Dispensary Agent	10
Security Personnel	4

The Company is committed to building a culture centered on employee development and education. The Company strives to provide an environment that encourages employees to learn, ask questions, and provide input and suggest new policies and processes. In order to ensure that employees' needs are met, employees and consultants are assigned to a department for oversight. The manager of the assigned department is responsible for oversight of each employee.

Department managers oversee personnel assigned to their department, and the Chief Operating Officer is responsible for overseeing all department managers. This structure allows for better communication, cohesion, and clarity among employees and superiors. During monthly team meetings with all personnel, the executive team will provide an opportunity for further discussion between all channels of communication.

The following presents the detailed organizational chart, which outlines the organizational flow between connection between executive leadership, directors, and managers in the various departments. Please note that the organizational chart below depicts a planned organizational flow for the entire cannabis operation from cultivation through production and the dispensing facility. This application is just for a dispensary application, but the Company's parent company will also have cultivation and production operations within its corporate structure.





## **Section V**

# **Mitigation & Prevention of Potential Adverse Effects**

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## **Introduction**

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The Company has taken great precautions in creating its security and safety plans, with the intention of protecting its customers, employees, patients, and caregivers. The Company does not expect to cause increased demands on the City's police, fire, emergency, or health-related services and does not expect to cause an adverse impact on the City of Lynn. Moreover, The Company is highly aware of the risks and social issues that could potentially be associated with this project and intends to implement a number of preventative security and educational processes to mitigate these. The Company believes that if proper preventative measures are taken, the City will have a similar experience to Northglenn, Colorado, where Natural Selections, Colorado operates its current facility.

The Company intends to implement the following procedures to mitigate issues associated with crime, drugged driving, distribution to minors, public consumption, and adverse health effects: The Company is committed to improving Lynn's economy and integrating seamlessly into its community and will take full responsibility for offsetting any potential use of resources, while simultaneously bettering the economy.

## **Preventing Increased Crime**

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The Company does not expect that the legalization of cannabis will result in an increase in crime. According to an independent study published by criminologists at the University of Texas at Dallas, medical marijuana legalization actually may be correlated with a reduction in homicide and assault rates.<sup>4</sup>

Despite these findings, the Company is committed to implementing intensive security measures to ensure that the legalization of cannabis does not result in increased crime rates. The Company believes that preventive security measures are the best way to ensure that there is no illegal distribution or diversion of the products sold at their dispensary. The Company has created these security measures—which are described in detail in the Security Plan in Section II based on the concept of “Concentric Circles of Protection,” which are compliant with regulations and based on varying levels of protection that work in conjunction with one another to create and maintain a secure and safe facility.

The Company intends to form a relationship with the city's police department and will endeavor to meet on an annual basis to discuss concerns and effective security operations regarding the dispensary. While the Company does not expect an increase in crime rate or an increased demand on the city's police department, the Company anticipates that its host community agreement impact fee payments will mitigate any financial drain on the city's resources.

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<sup>4</sup> Barnes, J.C., Robert G. Morris, Michael TenEyck, and Tomislav V. Kovandzic. “The Effect of Medical Marijuana Laws on Crime: Evidence from State Panel Data, 1990-2006.” PLoS ONE 9(3): e92816. March 2014.

## **Preventing Drugged Driving**

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The Company will develop, implement, and maintain educational materials and seminars designed to prevent drugged driving and other adverse public health consequences associated with marijuana use. The Company will design training procedures and policies to educate consumers and employees about the risks associated with operating a motor vehicle after consuming cannabis.

The educational materials will outline Massachusetts law so that employees will be able to inform consumers that Massachusetts law prohibits any driving under the impairment of cannabis:

- According to Massachusetts General Laws Chapter 90, Section 24, it is a criminal offense to operate a motor vehicle “while under the influence of intoxicating liquor, or of marijuana, narcotic drugs, depressants or stimulant substances, as defined in section one of chapter ninety-four C, or the vapors of glue.” Massachusetts has not determined the amount of cannabis in the blood stream allowing someone to legally operate a motor vehicle. Therefore, deciding if a driver is impaired by marijuana is determined by the prosecutor on a case-by-case basis.
- According to Massachusetts law, being legally entitled to cannabis is not an acceptable defense when charged with a drugged driving offense. In addition to this information, consumers will also be provided with information about the penalties for driving under the influence of substances that impair driving abilities including cannabis. According to Massachusetts law the maximum penalty for the first offense of driving under the influence is up to 30 months jail time, license suspension for up to one year, and the fines and penalties for driving under the influence range from \$500 to \$5,000. (State DUI Driving Laws).

## **Cannabis and Driving**

Each Customer will receive an informational pamphlet specifically addressing the following questions regarding cannabis and drugged driving. All dispensary agents will be trained to provide more information and answer follow-up questions to any of these:

*Q: Does marijuana impair my ability to drive?*

A: Yes, any amount of marijuana can impair an individual’s ability to drive. Therefore, individuals should find other options for transportation such as a designated driver, utilizing public transportation, taxis, or car companies such as Uber or Lyft.

*Q: What is the legal limit of marijuana impairment while operating a motor vehicle in Massachusetts?*

A: There is no legal limit of marijuana according to Massachusetts General Law. Medical marijuana is not considered to be an appropriate defense against the charge of driving under the influence. If a substance has impaired your ability to drive, even if it is medically prescribed and legally acquired, it is illegal to operate a vehicle.

*Q: How does law enforcement determine impairment by the use of marijuana?*

A: Officers are becoming trained to look out for warning signs associated with driving under the impairment of marijuana. Additionally, while Massachusetts does not legally require that drivers submit to a drug test to determine impairment the refusal to submit a drug test can be included in evidence if a person is charged with driving under the influence.

### **Preventing Distribution to Minors**

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The Company understands the potential risk of illegal cannabis distribution to minors. The Company is committed to preventing distribution of the products sold at their Massachusetts dispensary to minors other than as allowed by state law and regulations.

The Company will begin prevention on the premises with rigorous physical security measures that ensure only eligible recreational consumers, registered qualifying patients, personal caregivers, dispensary agents and other authorized individuals can access the dispensary (as applicable). The Company will also train employees to inspect photo identification and registration cards, which customers, physicians, patients, and caregivers will present upon entering the dispensary (as applicable). The dispensary will be designed in a neutral and secure fashion and it will neither attract the attention of loiterers or minors, nor encourage any congregating outside of the dispensary. In the event that the Company becomes aware of such activity, or is otherwise suspicious, it will take immediate action.

### **Branding & Packaging**

The Company is committed avoiding any images or branding strategies that would seek to influence or attract consumers from the general public, specifically minors. The Company will only pursue advertisement opportunities that promote the company in a responsible manner to an audience that has at least 85% of persons reasonably expected to be age 21+ or older.

The Company understands that packaging and labels is a critical part of preventing the distribution of cannabis to minors. The Company will select packaging that is highly compliant with all regulations and designed to prevent accidental ingestion by children. Products will be packaged in plain, opaque, tamper or child resistant containers without depictions of the product, cartoons, or images other than the dispensary's logo.

Edible Marijuana Infused Products ("MIPs") in the following shapes is prohibited:

1. The distinct shape of a human, animal, or fruit; or
2. A shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.

All cannabis products sold by the dispensary will have labels that detail the potency, types of chemicals used in cultivation, and other necessary information. The Company will not utilize any statement, design, representation, picture or illustration that portrays anyone under 18 years of age.

### **Location, Security, & Surveillance**

The Company understands that its location, security, and surveillance systems will also be critical in preventing the illegal distribution of medical marijuana to minors or other non-registered users. The Company has chosen a location for its dispensary that is highly compliant with the

regulations. The dispensary, which is located at 193-195 Oxford Street, Lynn MA, is not situated within 300 feet of a K-12 public or private school, as required by the City of Lynn regulations. The Company specifically chose this location, as it is a significant distance from any area that would be considered to be at risk for the congregation of minors and is much more commercial in nature.

The dispensary will in no way reference the sale of marijuana through its logo, external signage or on the exterior of its premises abiding with Massachusetts's law. The signage outside of the dispensary will only be illuminated 30 minutes prior to the dispensary's closing and there will be no neon signage that may attract potential loiterers. The Company will also ensure that security measures are taken if there appears to be loitering outside of the dispensary.

The Company will ensure that the dispensary premises are under video surveillance 24 hours a day and 7 days a week and will make the surveillance available for inspection by the CCC and/or Lynn Police Department at all times. Security personnel will be on site at all times to remove individuals not complying with all regulations

### **Preventing Health Issues**

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The Company is aware of the potential health concerns associated with cannabis consumption. To this effect, the Company will be committed to offering a variety of products and methods of consumption that allow consumers and patients to benefit from cannabinoids while ingesting little to no carcinogenic plant material or residual toxins.

- **Smoking.** While there is no scientific evidence linking smoking marijuana to lung cancer, the Company is aware of the potential damage that regular smoking could have on the lungs. To this effect, the Company will offer a wide variety of infused products, including tinctures, capsules, teas, and topicals for consumers and patients who do not wish to inhale burning plant vegetation. The Company will also offer a selection of vaporizer pens that allow consumers to inhale the vapor of cannabis concentrates and oils.
- **Butane Residuals.** The Company is also aware of the trace residual toxins found in cannabis-infused products and concentrates that are manufactured using butane-based solvents. In July of 2015, the state of Washington became the first state to ban the use of butane as an extraction solvent for medical patients. Boulder County, Colorado, has taken provisions to establish similar measures. Although there is limited research and data available on the effects of residuals, these legal measures have underscored the possibility of these trace residuals being a threat to consumers and patients with compromised immune systems seeking cannabis as medicine. The Company is committed to purchasing a CO2 extraction machine for its manufacturing/processing lab and using CO2 as a processing method.

### **Other Potential Effects on City**

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The Company has considered other potential effects that its operations could have on the City of Lynn and has outlined solutions and strategies to mitigate these.

### **Increased Demands on Lynn Fire Department**

The Company will not be cultivating marijuana on site at its dispensary. Therefore, the Company does not expect that its operations will have any emergency incidents that will increase the burden on the city's fire department. The Company will ensure that its dispensary is fully compliant with fire codes and fire prevention. The Company will form a relationship with the city's fire department and ensure that all staff members receive training in regard to preventative fire techniques, as well as fire suppression and avoidance. The Company is committed to ensuring that its dispensary is fully compliant with fire code and fire safety prevention techniques, thereby causing no additional demand on the city's emergency fire services.

### **Increased Demands on Lynn's Emergency Services**

The Company does not expect to require or impact the city's emergency services. However, in the event of an emergency, the Company understands that its Host Community Agreement impact fee payment is designed to mitigate these expenses.

### **Increased Demands on Lynn's Health Services**

While the Company expects that its dispensary will have a positive impact on the community's health and education, the Company does understand the potential health risks associated with marijuana. The Company is committed to educating customers about the potential risks of marijuana. The Company intends to use its position as a dispensary to educate the community about substance abuse and the responsible use of cannabis.

Including its preventive measures, the Company expects that its Host Community Agreement Impact fee payment will mitigate any potential financial demand on the city's health services.

### **Increased Air, Noise, Light and/or Water pollution**

The Company intends to comply with all Federal, State, and local requirements regarding increased air, noise, light, and water pollution created by its proposed facility. While the Company does not intend that its dispensary will have a negative impact on the community, should any problems arise regarding increased air, noise, light, or water pollution, the Company will work with the community to ameliorate any negative impact.

- **Air Pollution:** The Company will not be cultivating marijuana on-site at its dispensary. Therefore, the Company does not expect an increase in air pollution at its dispensary location.
- **Noise Pollution:** The Company does not expect an increase in noise pollution. The Company purposefully chose a commercial location to open its dispensary in order to avoid issues associated with noise pollution.
- **Light Pollution:** The Company's security system will utilize motion-sensor lighting in order to prevent theft or breaches of security on the premises, especially at night. These motion-sensor lights will illuminate all entrances and the parking lot and will be used to detect loitering or intrusion. However, the Company does not intend to illuminate the exterior of the Facility during daylight hours or beyond hours of operation, barring any emergency circumstance or as requested by the City or the Commission. This should

minimize potential lighting pollution. The Company chose a commercial area for its location in order to avoid problems associated with light pollution. The Company intends to work with its community in order to ensure that its additional lighting does not cause issues for surrounding businesses.

- **Water Pollution:** The Company will be cultivating marijuana off-site therefore the Company does not anticipate an increase in water pollution at the dispensary.

## Section VI

# Best Practices & Standard Operating Procedures

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## Quality Control Best Practices

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The Company is committed to a rigorous testing policy and has established partnerships with ISO-certified laboratories to test all produced strains and cannabis-infused products. The Company has established quality control protocols that require the testing of all products for chemical and biological contaminants prior to selling them at the dispensary. The dispensary shall maintain the results of all testing for no less than one year;

Marijuana shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of non-organic pesticides.

The Company will ensure that each product is tested for the following:

- **Cannabinoid profile.** The testing results will include at minimum the dry weight cannabidiol (CBD) and tetrahydrocannabinol (THC).
- **Metals** (including arsenic, cadmium, lead, and mercury)
- **Pesticide Residue and Plant Growth Regulators**
- **Microbial contaminants and mycotoxins**
- **Residual solvents.** As described above, the Company will utilize Supercritical Carbon Dioxide extraction methods, which do not leave residuals in the products.
- **Finished Plant Material Production**
- **Concentrate Production**

The Company will implement policies and procedures for responding to results indicating contamination, which shall include destruction of contaminated product and assessment of the source of contamination. These policies will be available to recreational consumers, registered qualifying patients and personal caregivers.

The Company is committed to quality assurance in all elements of its cultivation, production, and servicing. Other quality control procedures beyond rigorous testing include:

- **Facility and equipment.** All facilities used by the Company will have adequate work areas and equipment for the intended task. The facilities will have sufficient space, a clean environment, and appropriate lighting, ventilation, heating, cooling, plumbing, washing and sanitation. Equipment will not contaminate products or otherwise react with, add to, or be absorbed by product and will be properly maintained, calibrated, cleaned, and sanitized at appropriate intervals following written procedures.
- **Control of components, containers and closures.** Written procedures will be developed, maintained and followed that describe the handling, review, acceptance, and control of material used in the manufacture of products. Materials will be controlled (segregated, labeled) until they have been examined and released for use. Materials will be handled and stored in a manner that prevents degradation or contamination.
- **Chain of Custody.** The Company will emulate current inventory control systems at the facility in Colorado, which entails a series of comprehensive policies and procedures to ensure a clear chain of custody and accountability for all aspects of the Company's inventory and recordkeeping processes. All plants, raw materials, finished products, and

byproducts will be tracked and properly stored throughout the course of cultivation, processing, and dispensing.

- **Packaging, labeling and distributing.** All products shall be suitably packaged in accordance with regulations to protect products from alteration, contamination, damage during storage, and handling and shipping. All products will be packaged in tight, light-resistant containers and stored at controlled room temperature (unless otherwise indicated). All labels will be examined prior to distribution to ensure the information matches the compounding and formulation record requirements. If any discrepancies are observed, the product shall be immediately quarantined and investigated. All employees must verify that all labels have the correct names, amounts or concentrations of ingredients, total volume, beyond-use date, appropriate routes of administration, storage conditions, and other safe use information as needed. A distribution record of each batch will be kept that is sufficiently detailed to allow traceability and facilitate a recall if necessary.
- **Cleaning and Sanitizing.** Cleaning, sanitizing and organizing of the dispensing areas must be performed at the beginning of each day and may be performed additionally as necessary.

### **Waste Disposal Plan**

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The Company understands the risk associated with negligent waste disposal methods, which can potentially lead to diversion, theft, and redistribution. The Company will emulate waste disposal strategies at the facility in Colorado, which have been designed to prevent theft from occurring after the necessary disposal of cannabis plant material, damaged plants, and contaminated cannabis products. The Company is committed to monitoring, recording, and securing the destruction of all cannabis, cannabis products, and cannabis plant material in an adequate manner compliant with all regulations.

The Company is committed to educating all agents on the importance of proper waste disposal methods and the risks and dangers associated with not following these procedures. The manager will be responsible for upholding all waste management policies and performing regular checks to ensure that no incidents of diversion have occurred. Agents will receive extensive training regarding waste disposal methods and will be expected to uphold these policies as well. No cannabis waste will be processed at the Company's dispensary.

- In compliance with regulations, all disposed waste containing cannabis material or byproducts must be rendered useless and unrecognizable. Agents will be responsible for grinding and incorporating the cannabis waste with solid wastes such that the resulting mixture renders the cannabis waste unusable. All weighed waste is mixed at 1:1 rate with used media.
- In compliance with regulations, when cannabis or MIPs are disposed of, the Company will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the persons present during the disposal, with their signatures. The Company will keep disposal records for at least two years.
- The Company will dispose of all solid waste generated at its dispensary or cultivation facility as follows (as applicable):

- (a) Incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP). No fewer than two dispensary agents must witness and document destruction; or
  - (b) Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located. No fewer than two dispensary agents must witness and document disposal in the landfill; or
  - (c) Grinding and incorporating the cannabis waste with solid wastes such that the resulting mixture renders the cannabis waste unusable. Once such cannabis waste has been rendered unusable, it may be:
    - Disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located; or
    - If the material mixed with the cannabis waste is organic material as defined in the regulations, the mixture may be composted at an operation that is in compliance with the requirements of the regulations.
- Dumpsters and waste bins used will meet all state and local laws, and when not in use are kept locked.
  - Video surveillance will be present at limited access entries and exits in areas containing waste. The keys or access codes to waste disposal areas are only provided to necessary cultivation and manufacturing facility staff and waste management staff members.

## **Section VII**

# **Financial Projections**

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Year 1	Month 0	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Year 1
	(training)	(Open)												
<b>Revenue</b>	-	763,885	802,079	778,017	770,237	771,546	772,858	774,172	775,488	776,806	778,127	779,449	780,774	9,323,437
Cost of Goods Sold		389,581	409,060	396,789	392,821	393,489	394,157	394,828	395,499	396,171	396,845	397,519	398,195	4,754,953
Cost of Labor	71,423	142,846	149,989	145,489	144,034	144,279	144,524	144,770	145,016	145,263	145,510	145,757	146,005	1,814,906
Reserves for HCA and License fees		27,417	28,562	27,841	27,607	27,646	27,686	27,725	27,765	27,804	27,844	27,883	27,923	333,703
Operating Expenses	17,187	17,187	18,047	17,505	17,330	17,360	17,389	17,419	17,448	17,478	17,508	17,538	17,567	226,965
Overhead Expenses	42,884	42,884	42,885	42,886	42,887	42,888	42,889	42,890	42,891	42,892	42,893	42,894	42,895	557,558
<b>Total Expenses</b>	<b>131,495</b>	<b>619,916</b>	<b>648,543</b>	<b>630,510</b>	<b>624,679</b>	<b>625,662</b>	<b>626,646</b>	<b>627,632</b>	<b>628,619</b>	<b>629,608</b>	<b>630,599</b>	<b>631,591</b>	<b>632,585</b>	<b>7,688,085</b>
<b>EBITDA</b>	<b>(131,495)</b>	<b>143,969</b>	<b>153,536</b>	<b>147,507</b>	<b>145,557</b>	<b>145,884</b>	<b>146,212</b>	<b>146,540</b>	<b>146,869</b>	<b>147,198</b>	<b>147,528</b>	<b>147,858</b>	<b>148,189</b>	<b>1,635,352</b>

Year 2	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24	Year 2
<b>Revenue</b>	<b>782,102</b>	<b>783,431</b>	<b>784,763</b>	<b>786,097</b>	<b>787,434</b>	<b>788,772</b>	<b>790,113</b>	<b>791,456</b>	<b>792,802</b>	<b>794,150</b>	<b>795,500</b>	<b>796,852</b>	<b>9,473,472</b>
Cost of Goods Sold	398,872	399,550	400,229	400,910	401,591	402,274	402,958	403,643	404,329	405,016	405,705	406,395	4,831,471
Cost of Labor	146,253	146,502	146,751	147,000	147,250	147,500	147,751	148,002	148,254	148,506	148,758	149,011	1,771,539
Reserves for HCA and License fees	27,963	28,003	28,043	28,083	28,123	28,163	28,203	28,244	28,284	28,324	28,365	28,406	338,204
Operating Expenses	17,597	17,627	17,657	17,687	17,717	17,747	17,778	17,808	17,838	17,868	17,899	17,929	213,153
Overhead Expenses	42,896	42,897	42,898	42,899	42,900	42,901	42,902	42,903	42,904	42,905	42,906	42,907	514,818
<b>Total Expenses</b>	<b>633,581</b>	<b>634,579</b>	<b>635,578</b>	<b>636,579</b>	<b>637,582</b>	<b>638,586</b>	<b>639,592</b>	<b>640,600</b>	<b>641,609</b>	<b>642,620</b>	<b>643,633</b>	<b>644,648</b>	<b>7,669,186</b>
<b>EBITDA</b>	<b>148,520</b>	<b>148,853</b>	<b>149,185</b>	<b>149,518</b>	<b>149,852</b>	<b>150,186</b>	<b>150,521</b>	<b>150,857</b>	<b>151,193</b>	<b>151,529</b>	<b>151,867</b>	<b>152,204</b>	<b>1,804,287</b>

## *Lynn Organics LLC*

### **Separating Recreational from Medical Operations:**

Currently, Lynn Organics LLC (the “**Company**”) is only applying for a Marijuana Retailer license at this location.

Should the Company ultimately apply for, and be licensed for, a registered marijuana dispensary license that permits the sale of Medical Marijuana then it shall be a policy of the Company that marijuana and marijuana products for medical use shall only sold to registered qualifying patients and personal caregivers. The Company shall refuse to sell marijuana to any registered qualifying patient or personal caregiver who is unable to produce a registration card and valid proof of identification, or who does not have a valid certification. The identification must contain a name, photograph, and date of birth, and shall be limited to one of the following:

1. A drivers license;
2. A government issued identification card;
3. A military identification card; or
4. A passport.

The Company shall physically separate medical and adult-use sales areas. Subject to final approval by the Commission, such separation shall be provided by a temporary or semi-permanent physical barrier, such as a stanchion, that adequately separates sales areas of marijuana products for medical use from sales areas of marijuana products for adult use. The Company shall provide for separate lines for sales of marijuana products for medical use from marijuana products for adult use within the sales area, provided, however, that the holder of a medical registration card shall be permitted to use either line and shall not be limited only to the medical use line. The Company shall adopt separate accounting practices at the point-of-sale for medical and adult-use sales.

The Company shall additionally provide an area that is separate from the sales floor to allow for confidential consultation.

This policy may also be referred to by the Company as the “**Policy for Separating Recreational from Medical Operations**”.

## *Lynn Organics LLC*

### **Restricting Access to Age 21 and Older:**

Lynn Organics LLC (the “**Company**”) shall require that all Marijuana Establishment Agents, Visitors and Consumers of marijuana for adult use (each as defined in 935 CMR 500.002) are 21 years of age or older. The Company will positively identify individuals seeking access to the premises of the Marijuana Establishment, or to whom marijuana or marijuana products are being transported pursuant to 935 CMR 500.105(14) (if applicable) to limit access solely to individuals 21 years of age or older.

Pursuant to 935 CMR 500.140, the Company shall immediately inspect an individual’s proof of identification and determine that the individual is 21 years of age or older upon entry to the Marijuana Establishment.

Currently, the Company is only applying for a Marijuana Retailer license at this location. Should the Company ultimately apply for, and be licensed for, a registered marijuana dispensary license that permits the sale of Medical Marijuana then, if an individual is younger than 21 years old, but 18 years of age or older, he or she shall not be admitted unless they produce an active medical registration card issued by the Commission. If the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active medical registration card and they are accompanied by a Personal Caregiver (as defined in 935 CMR 501.002) with an active medical registration card. In addition to the medical registration card, registered qualifying patients 18 years of age and older and Personal Caregivers must also produce proof of identification.

This policy may also be referred to by the Company as the “**Policy to Restrict Access to Persons Age 21 and Older**”.

## *Lynn Organics LLC*

### **Maintaining of Financial Records:**

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

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

Furthermore, consistent with the Company’s *Dispensing Policy*, the Company shall implement the following policies for Recording Sales

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



## *Lynn Organics LLC*

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

This policy may also be referred to by the Company as the “**Financial Record Maintenance and Retention Policy**”.

## *Lynn Organics LLC*

### **Record Keeping Procedures:**

Lynn Organics LLC (the “**Company**”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) Personnel records as described in the Company’s *Personnel and Background Check Policy*;
- (e) Business records as described in the Company’s *Financial Record Maintenance and Retention Policy*, which shall include manual or computerized records of assets and liabilities; and 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; and salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any; and
- (f) Waste disposal records as required under 935 CMR 500.105(12), including but not limited to, a written or electronic record of the date, the type and quantity of marijuana, marijuana products or waste disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two (2) Marijuana Establishment Agents present during the disposal or other handling, with their signatures. The Company shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Following closure of a Marijuana Establishment, the Company shall keep all records for at least two (2) years at the Company’s expense and in a form and location acceptable to the Commission.

It shall be a Policy of the company that any and all records subject to any enforcement action shall be retained for the duration of such action, or as otherwise extended by order of the Commission.

This policy may also be referred to by the Company as the “**Record Retention Policy**”.

## *Lynn Organics LLC*

### **Personnel Policies Including Background Checks;**

Lynn Organics LLC (the “**Company**”) shall implement the following Personnel Policies and Background Check policies:

1. It shall be a policy of the Company that the workplace shall be alcohol, smoke and drug-free.
2. The Company shall require that all personnel strictly adhere to, and comply with, all aspects of the Security Policy, which policy shall be incorporated herein by reference, specifically employee security policies, including personal safety and crime prevention techniques;
3. The Company shall develop a staffing plan and staffing records in compliance with 935 CMR 500.105(9);
4. The Company shall develop emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
5. The Company shall immediately dismiss any Marijuana Establishment agent who has:
  - a. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  - b. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - c. 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.
6. The Company shall make a list of all board members and executives of the Marijuana Establishment, and members of the licensee (if any), available upon request by any individual. The Company shall also make this list available on its website.
7. The Company shall develop policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
8. The Company shall apply for registration for all of its board members, directors, employees, executives, managers, and volunteers. All such individuals shall:
  - (a) be 21 years of age or older;
  - (b) not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
  - (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.
9. An application for registration of a marijuana establishment agent shall include:
  - (a) the full name, date of birth, and address of the individual;
  - (b) all aliases used previously or currently in use by the individual, including maiden name, if any;
  - (c) a copy of the applicant’s driver’s license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
  - (d) an attestation that the individual will not engage in the diversion of marijuana products;

## *Lynn Organics LLC*

- (e) written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
  - (f) background information, including, as applicable:
    - 1. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
    - 2. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
    - 3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
    - 4. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant.
  - (g) a nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
  - (h) any other information required by the Commission.
10. An executive of the Company registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration, shall submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom the Marijuana Establishment seeks a marijuana establishment agent registration, obtained within 30 days prior to submission.
11. The Company shall notify the Commission no more than one (1) business day after a marijuana establishment agent ceases to be associated with the Company. The subject agent's registration shall be immediately void when the agent is no longer associated with the Company.
12. The Company shall require that all agents renew their registration cards annually from the date of issue, subject to a determination by the Commission that the agent continues to be suitable for registration.
13. After obtaining a registration card for a marijuana establishment agent, the Company shall notifying the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five (5) business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

## *Lynn Organics LLC*

14. The Company's agents shall carry their registration card at all times while in possession of marijuana products, including at all times while at the Marijuana Establishment or while transporting marijuana products.
15. Should any of the Company's agents be affiliated with multiple Marijuana Establishments the Company shall ensure that such agents are registered as a marijuana establishment agent by each Marijuana Establishment and shall be issued a registration card for each establishment.

### **Personnel Record Keeping**

The Company shall maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records 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 (8) 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.

The Company's aforementioned Personnel Records shall be available for inspection by the Commission, upon request. All records shall be maintained in accordance with generally accepted accounting principles.

Following closure of the Company's Marijuana Establishment, all records shall be kept for at least two years at the Company's expense, in a form and location acceptable to the Commission.

### **Staffing Plan:**

Executive Level:

- CEO;
- CFO; and
- COO.

## *Lynn Organics LLC*

### Management Level:

- Sales Manager; and
- Security Manager.

### Staff Level

- Up to fifteen (15) Staff Level Sales Representatives;

### Consultant Level

- Attorney / Compliance Officer;
- Human Resources Provider; and
- Up to five (5) Security Officers.

This policy may also be referred to by the Company as the “**Personnel and Background Check Policy**”.

## *Lynn Organics LLC*

### **Quality Control and Testing for Contaminants:**

#### **Testing of Marijuana**

Lynn Organics LLC (the “**Company**”) shall not sell or otherwise market for adult use any marijuana product, including marijuana, that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

The Company is not proposing to cultivate or produce its own products at this time. The Company intends to obtain all of its products from other duly licensed Marijuana Establishments.

The Company shall ensure that all marijuana products sold at its Marijuana Establishment have been tested by an Independent Testing Laboratory that tests the marijuana products in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the Massachusetts Department of Public Health (the “**DPH**”) and to test its environmental media (e.g., soils, solid growing media, and water) in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the DPH.

The Company shall ensure that all marijuana products have been tested for contaminants as specified and required by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

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

The Company shall maintain the results of all testing completed by it for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with the Company’s Transportation Policy and 935 CMR 500.105(13).

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

#### **Handling of Marijuana**

## *Lynn Organics LLC*

The Company shall handle and process marijuana and marijuana products in a safe and sanitary manner. The Company shall implement the following policies (as applicable to its Marijuana Retail License):

(a) To the extent applicable the Company shall process the leaves and flowers of the female marijuana plant only, which shall be:

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

(b) The Company shall comply with the following sanitary requirements:

1. Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging shall comply with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
2. Any marijuana establishment agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
  - i. Maintaining adequate personal cleanliness; and
  - ii. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. The Company shall supply adequate and convenient hand-washing facilities furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. The Company shall supply sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. The Company shall ensure that there will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;



## *Lynn Organics LLC*

9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall 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 shall be so designed and of such material and workmanship as to be adequately cleanable;
  10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
  11. The Company's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
  12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines;
  13. The Company shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
  14. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
  15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
  16. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
- (c) The Company shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

This policy may also be referred to by the Company as the “**Quality Control and Testing Policy**”.

## *Lynn Organics LLC*

### **Employee Qualifications and Training:**

Lynn Organics LLC (the “**Company**”) 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, and at a minimum shall include a Responsible Vendor Program under 935 CMR 500.105(2)(b). It shall be a policy of the Company that all marijuana agents and staff shall receive and participate in, a minimum of, eight (8) hours of on-going training annually.

Company Training Policies shall be as follows:

1. On or after July 1, 2019, all current owners, managers and employees of the Company 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.”
2. Once the Company is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire.
3. It shall be a policy of the Company that after initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.”
4. Administrative employees who do not handle or sell marijuana may take the “responsible vendor” program on a voluntary basis.
5. The Company shall maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

The Company shall ensure that such responsible vendor training programs core curriculum include the following:

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

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

The Company shall also ensure that all of its board members, directors, employees, executives, managers, and volunteers shall:

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

This policy may also be referred to by the Company as the “**Employee Qualification and Training Policy**”.

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### **Diversity Plan**

Lynn Organics LLC, a wholly owned subsidiary of NS AJO Holdings Inc. (collectively the “**Company**”) understands and appreciates the importance of diversity and as such is committed to actively working to ensure a diverse work place is created in the Company.

It is a policy of the Company to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations (i.e. L.G.B.T.Q +) in the operation of the Marijuana Establishment. To the extent permissible by law, the Company will make jobs available to minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations (i.e. L.G.B.T.Q +), but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements. To this end, the Company will deploy a plan for enhancing diversity and equity within the organization through a number of various outreach efforts.

Specifically, as it relates to its own internal practices, the Company will implement the following policies in connection with its diversity plan:

#### **Goals:**

1. The Company endeavors to provide job opportunities to minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations (i.e. L.G.B.T.Q +) and as its employee base grows, it shall be a goal of the Company to increase the number of individuals employed by the Company that fall within the aforementioned target demographics by **10% (or a minimum of 1 job, whichever is greater)** of the number of jobs added.
2. It shall be a goal of the Company to offer **advancement to management and executive positions internally**. This goal seeks to provide opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement.
3. The Company shall seek parity in its work force based on the American Community Survey (ACS) 2010 U.S. Census. Workforce availability statistics for the Total Civilian Labor Force for Massachusetts are as follows: **Women 48.8%, Minorities 20.7%, Persons with Disabilities 12%, and Veterans 7%.**
4. It shall be a goal of the Company to ensure that all of its employees receive **training on diversity and sensitivity**.

#### **Programs:**

To the extent reasonably practicable, the Company shall Implement the following programs:

1. In an effort to ensure it has the opportunity to interview, and hire a diverse staff, the Company will post **monthly notices** for **three (3) months** prior to opening any of its Marijuana Establishments in local newspapers of general circulation such as the **Lynn**

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**Daily Item, Fitchburg Sentinel & Enterprise and Boston Herald** and post a notice at the municipal offices in Lynn, Fitchburg and Boston **three (3) months** prior to opening. The aforementioned notices will state that the Company is specifically looking for women, minorities, or persons with disabilities to work for the Company. The Company also intends to advertise its job openings through **MassHire**;

2. In an effort to ensure the Company meets its goal of offering advancement to management and executive positions internally, the Company shall offer **100% of the Company's opportunities for** advancement internally.
3. As described above it is a goal of the Company to seek parity in its workforce; accordingly, the Company shall form a diversity and equity committee to monitor the Company's progress towards meeting those goals. This committee will meet **Quarterly** to review and assess the Company's hires and hiring practices. **Meeting minutes** will be provided to the Commission upon request and for the Company's annual license renewal application.
4. The Company shall require that employees receive education on diversity, implicit biases and sensitivity within the **first ninety (90) days of employment** and **once annually thereafter**.

### **Measurements:**

To the extent reasonably practicable and as allowed by law, the Company shall implement the following measurements:

- a. Pursuant to 935 CMR 500.103(4)(a) the Company's diversity and equality committee shall prepare an annual report identifying the Company's efforts to encourage diversity in the work place, in compliance with 935 CMR 500.101(c)(7)(k) and this Diversity Policy. Specifically, said report shall identify the demographics of its employee population including but not limited to identifying the gender, race, sexual orientation (i.e. L.G.B.T.Q +) and disabled status of its employees without identifying the employee specifically and to the extent each employee is willing to share such information. Additionally, this report will include the following metrics:
  - i. Number of individuals from the target demographic groups who were hired and retained after the issuance of a license;
  - ii. Number of promotions for people falling into the target demographics since initial licensure and number of promotions offered;
  - iii. Number of jobs created since initial licensure;
  - iv. Number of job postings in publications with supporting documentation; and

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- v. Number and subject matter of internal trainings held on diversity, implicit biases and sensitivity and the number of employees in attendance.

The Company affirmatively states that: (1) it has reached out to MassHire to confirm that it can post job offers through that organization; (2) it acknowledges and is aware, and 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; (3) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws; and (4) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.

This policy may also be referred to by the Company as the “**Diversity Plan**”.