



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281614
Original Issued Date: 09/22/2020
Issued Date: 09/22/2020
Expiration Date: 09/22/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Natural Agricultural Products, LLC

Phone Number: 508-802-2315 Email Address: gleonard@napbrockton.com

Business Address 1: 4 Main St.

Business Address 2: Suite 215

Business City: Brockton

Business State: MA

Business Zip Code: 02301

Mailing Address 1: 4 Main St.

Mailing Address 2: Suite 215

Mailing City: Brockton

Mailing State: MA

Mailing Zip Code: 02301

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 50

Percentage Of Control: 50

Role: Owner / Partner

Other Role:

First Name: Gary

Last Name: Leonard

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: 50 Percentage Of Control: 50
Role: Owner / Partner Other Role:
First Name: Kathryn Last Name: Redden 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:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control:
Role: Manager Other Role: Research and Development
First Name: David Last Name: Willette Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: Percentage Of Control:
Role: Other (specify) Other Role: Investor
First Name: Keshaudas Last Name: Pahuja Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Some Other Race or Ethnicity
Specify Race or Ethnicity: Pakistan

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: David Last Name: Willette Suffix:
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$200000 Percentage of Initial Capital: 33
Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Keshaudas Last Name: Pahuja Suffix:
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$400000 Percentage of Initial Capital: 67
Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Date generated: 12/03/2020

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 53 Spark St

Establishment Address 2:

Establishment City: Brockton

Establishment Zip Code: 02302

Approximate square footage of the Establishment: 6000

How many abutters does this property have?: 20

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	5e95d1952b97cf38fa377880	04/14/2020
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	5e95d198f0445c357cb09326	04/14/2020
Community Outreach Meeting Documentation	Attachment C.pdf	pdf	5e95d1a1d29ad935715989f5	04/14/2020
Community Outreach Meeting Documentation	Attachment D.pdf	pdf	5e95d1a5172cbc3545977a83	04/14/2020
Certification of Host Community Agreement	Attachment E.pdf	pdf	5e9609d3f0445c357cb094c8	04/14/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact.pdf	pdf	5e61322656474b469c1116c5	03/05/2020
Plan for Positive Impact	Acceptance of Donation (VNA).pdf	pdf	5e87b1839a385038d9d8aa1d	04/03/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Gary

Last Name: Leonard Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: Kathryn

Last Name: Redden Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Manager

Other Role:

First Name: David

Last Name: Willette Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Other (specify)

Other Role: Investor

First Name: Keshaudas

Last Name: Pahuja Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	cert of good standing.jpg	jpeg	5c86977d1e71bd126232d548	03/11/2019
Department of Revenue - Certificate of Good standing	cert of good standing2.jpg	jpeg	5c869783edbb73122a618be9	03/11/2019
Bylaws	bylaws.jpeg	jpeg	5cacbc395fd63c1b24ebb115	04/09/2019
Bylaws	bylaws2.jpeg	jpeg	5cacbc3f293a5312448ef144	04/09/2019
Secretary of Commonwealth - Certificate of Good Standing	certificate of good standing.pdf	pdf	5dde9f0fbcb01253152f8273	11/27/2019
Articles of Organization	articles of organization.pdf	pdf	5e31ea2264339304b08fcbdb	01/29/2020

No documents uploaded

Massachusetts Business Identification Number: 001311392

Doing-Business-As Name: Natural Agricultural Products, LLC

DBA Registration City: Brockton

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	N.A.P. Business Plan (003).pdf	pdf	5cacbc612724e81b525613ab	04/09/2019
Plan for Liability Insurance	Liability Insurance.pdf	pdf	5dde9fd240e348579197eb75	11/27/2019
Proposed Timeline	Proposed Timeline.pdf	pdf	5e6137dc73b705467fec9b47	03/05/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload
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				Date
Dispensing procedures	dispensing procedures.pdf	pdf	5cb601ebb1ec4a4c446c1b12	04/16/2019
Sample of unique identifying marks used for branding	sample of identifying marks.pdf	pdf	5cb604816b08e34c76328bdc	04/16/2019
Storage of marijuana	Storage.pdf	pdf	5ddea349bcb01253152f8282	11/27/2019
Transportation of marijuana	Transportation.pdf	pdf	5ddea361d5b0805341c642d4	11/27/2019
Inventory procedures	Inventory.pdf	pdf	5ddea375fd468857b99be564	11/27/2019
Restricting Access to age 21 and older	Restricting access.pdf	pdf	5ddea388b4f83557d6cc8d92	11/27/2019
Prevention of diversion	Prevention of Diversion plan.pdf	pdf	5ddea39e8bdcfd57ae527eaa	11/27/2019
Quality control and testing	Quality Control.pdf	pdf	5ddea3ba66a32657cfbdd20b	11/27/2019
Method used to produce products	Production methods.pdf	pdf	5ddea4dbb4f83557d6cc8daa	11/27/2019
Security plan	Operating Policies and Procedures Security Plan.pdf	pdf	5e31ea97fe55e40432f6dea2	01/29/2020
Personnel policies including background checks	Personnel Policies.pdf	pdf	5e31eb1564339304b08fcb7	01/29/2020
Maintaining of financial records	Maintenance of Financial Records Plan.pdf	pdf	5e31eb5ed43df3043d4b6765	01/29/2020
Qualifications and training	Qualifications and Intended Trainings for Agents.pdf	pdf	5e31eb807225f004696565b8	01/29/2020
Diversity plan	Diversity Plan.pdf	pdf	5e31eb955b05c304785e5300	01/29/2020
Record Keeping procedures	Record keeping.pdf	pdf	5e6138905a27c34431d18b28	03/05/2020
Types of products Manufactured.	Description of Products 3.19.2020.pdf	pdf	5e7380ac5f1da0353e2afb19	03/19/2020

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

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

Monday From: 7:00 AM	Monday To: 7:00 PM
Tuesday From: 7:00 AM	Tuesday To: 7:00 PM
Wednesday From: 7:00 AM	Wednesday To: 7:00 PM
Thursday From: 7:00 AM	Thursday To: 7:00 PM
Friday From: 7:00 AM	Friday To: 7:00 PM
Saturday From: 7:00 AM	Saturday To: 7:00 PM
Sunday From: 7:00 AM	Sunday To: 7:00 PM

corrad.gulierrez

LEGAL NOTICE
MORTGAGEE'S SALE OF REAL ESTATE

By virtue of and in execution of the Power of Sale contained in a certain mortgage given by Concord and Lusella Alencar Gulierrez to New Century Mortgage Corporation, dated January 13, 2006 and recorded in Plymouth County Registry of Deeds in Book 32075, Page 111 (the "Mortgage"), of which mortgage Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2 is the present holder. By Assignment from New Century Mortgage Corporation to Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2 dated November 3, 2011 and recorded at said Registry of Deeds in Book 42582, Page 301, for breach of conditions of said mortgage and for the purpose of foreclosing the same, the mortgaged premises located at 19 Madrid Square a/k/a 685 Oak Street, Building No. 19, Unit No. 9, of the Madrid Square Condominium, Brockton, MA 02301, will be sold at a Public Auction at 2:00 PM on January 24, 2020, at the mortgaged premises, more particularly described below, all and singular the premises described in said mortgage, to wit:

The Condominium Unit known as Building 19, Unit 9, (the "Unit"), in Madrid Square Condominium (the "Condominium") located at 685 Oak Street, Brockton, Massachusetts, and established by the grantor pursuant to Massachusetts General Laws, Chapter 183A, by Master Deed dated December 23, 1985, and recorded on December 26, 1985 with Plymouth County Registry of Deeds in Book 6496, Page 177, (the "Master Deed"), which Unit is shown on the floor plans filed simultaneously with said Master Deed and on the copy of the relevant portion of said floor plans attached thereto.

The Unit is conveyed together with:

1. An undivided 20.35 percent interest in the common areas and facilities (the "Common Elements") of the Condominium.
2. An easement for the continuance of all encroachments by the Unit on any adjoining Unit or Common Elements now existing or which may come into existence hereafter as a result of settling or shifting of the buildings, or as a result of repair or restoration of the buildings, or of the Unit after damage by fire or other casualty, or by reason of alteration or repair to the Common Elements, all as set forth in said Master Deed; and
3. An easement in common with the owners of other Units to use any pipes, wires, ducts, flues, conduits, public utility lines and other Common Elements located in or on the other Units or elsewhere on the Condominium property, and serving the Unit 1 all as set forth in said Master Deed.

4. An exclusive right to use one designated surface parking space for the purpose of parking one (only) private passenger car, subject to such rules and regulations as the Trustees of the Condominium may from time to time adopt (such Trustees may, from time to time designate and assign specific parking spaces to Units in the Condominium) and an exclusive right to use the individual storage area located outside the Unit as is assigned to the Unit by such Trustees, subject also to such rules and regulations as the Trustees may from time to time adopt.

The Unit is conveyed subject to:

A. Easements in favor of adjoining Units and in favor of the Common Elements for the continuance of all encroachments of such adjoining Units or Common Elements on the Unit, now existing or which may come into existence hereafter as a result of settling or shifting of the buildings, or as a result of repair or restoration of the buildings, or of any adjoining Unit or the Common Elements, all as set forth in said Master Deed; and

B. Easements in favor of the other Units to use the pipes, wires, ducts, flues, conduits, public utility lines and other Common Elements located in the Unit and serving such other Units.

C. The provisions of Chapter 183A, the Master Deed (including, without limitation, all matters set forth on Schedule A thereto), with floor plans of the Condominium recorded simultaneously with and as part of the Master Deed, and the provisions of Madrid Square Condominium Trust and the By-laws of the Condominium contain therein, recorded with the Master Deed, as the same may be amended from time to time by instruments duly recorded, which provisions together with any amendments thereto, shall constitute covenants running with the land and shall bind any person having at any time any interest of estate in the Unit, his family, servants and visitors, through such provisions were recited and stipulated at length herein.

The Unit is intended to be used only for residential purposes as provided in paragraph 6 of the Master Deed and subject to further restrictions on use as set forth in paragraphs 6 and 7 of the Master Deed, a complete copy of which provisions is attached to the Deed recorded herein and attached to the Deed Recorded in Book 8238, Page 244.

The Unit is conveyed subject to such further easements, restrictions of record, if any, as may be in force and applicable.

Being the same premises conveyed to the herein named mortgagor (s) by deed recorded with Plymouth County Registry of Deeds herein.

For mortgagor's title see deed recorded with the Plymouth County Registry of Deeds in Book 32075, Page 109.

The premises will be sold subject to any and all unpaid taxes and other municipal assessments and liens, and subject to prior liens or other enforceable encumbrances of record entitled to precedence over this mortgage, and subject to and with the benefit of all easements, restrictions, reservations and conditions of record and subject to all tenancies and rights of parties in possession.

Terms of the Sale: Cash, cashier's or certified check in the sum of \$5,000.00 as a deposit must be shown at the time and place of the sale in order to qualify as a bidder (the mortgage holder and his designee) are exempt from this requirement; high bidder to sign written Memorandum of Sale upon acceptance of bid balance of purchase price payable in cash or by certified check in thirty (30) days from the date of the sale at the offices of mortgagee's attorney, Korde & Associates, P.C., 900 Chestnut Street, Suite 3102, Lowell, MA 01851 or such other time as may be designated by mortgagee. The description for the premises contained in said mortgage shall control in the event of a typographical error in this publication.

Other terms to be announced at the sale.

Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-2
Korde & Associates, P.C.
900 Chestnut Street
Suite 3102
Lowell, MA 01851
(978) 256-1530
Gulierrez, Conrad, 19-033196

13860009 12/31/2019
1/7/14, 2020

Legals

ordinances

**CITY OF BROOKTON
ZONING BOARD OF APPEALS**
Notice is hereby given that a public hearing WILL BE HELD AT CITY HALL-COUNCIL CHAMBERS, on TUESDAY, JANUARY 14, 2020, AT 6:00 P.M.

Petition of JAMES BERTARELLI, 65 Magnolia Avenue, Brockton, MA, for a Variance from Sec. 27-9, 27-13 & 27-13A, to reapprove zoning that was granted in 2017 but expired in an R-1-B Zone, located at PLOT 8-24 STONE-HILL STREET.

Petition of JAMES BERTARELLI, 65 Magnolia Avenue, Brockton, MA, for a Variance from Sec. 27-9, 27-13 & 27-13A, to reapprove zoning that was granted in 2017 but expired in an R-1-B Zone, located at PLOT 9 TIFFANY DRIVE.

Petition of DAVINE SANTOS, 13 Blakely Circle, Randolph, MA, for a (Special Permit) to open an ice cream/lemonade stand business with two (2) stools in a C-2 Zone, located at 111 LEGION PARKWAY.

Petition of GREGORY HILLIARD, 30 Dagmar Drive, Brockton, MA, for a (Variance) to convert a two (2) family home into a three (3) family home in an R-1-B Zone, located at 403-405 TORREY STREET.

Petition of XPRSS ENTERPRISES, INC., 15 Hayward Avenue, Brockton, MA, for a Variance from Sec. 27-13A, to construct a single family home in an R-1-C Zone, located at 63 LAFOYE STREET.

Petition of RUBEN PIERRE, 44 Norfolk Road, Holbrook, MA, for a (Special Permit) from Sec. 27-29.1, for a Caribbean restaurant with takeout and dining for 100 seats in a C-2 Zone, located at 583 CENTRE STREET.

Petition of JACONAS DEOLIVEIRA CO ATTY ROBERT R. PELLEGRINI, 63 Main Street, Ste 1, Bridgewater, MA, for a Variance from Sec. 27-34(1), to operate an auto repair shop in a I-2 Zone, located at 50 MEADOWBROOK ROAD, UNIT 58.

Petition of GEORGE LYNN & ELIJAH WILKINSON, 40 Thica Road, Brockton, MA, for a (Variance) from Sec. 27-28, to open an adult daycare in an R-1-C Zone, located at 40 THICA ROAD.

Petition of LUCIE D. GOIN, 618 Summer Street, Brockton, MA, for a Variance from Sec. 27-9, to expand the back of the house for a master bedroom & bathroom, turn garage into a bedroom and add second (2) bath in an R-1-C Zone, located at 618 SUMMER STREET.

Petition of LILIANA MORALES, 19 Auburn Street, Brockton, MA, for a Kennel License to keep five (5) dogs in an R-1-C Zone, located at 19 AUBURN STREET.

"FOR ALL PETITIONS AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE"
Kenneth Galigan, Chairman
Michael Williams, Fire Chief
Stephen Bernard
Craig Pina
Dorcas Smith
Dec. 31st & Jan 7th

PLEASE REFER TO THE CITY OF BROOKTON WEB PAGE OR CALL AT 1-800-580-7150 BEFORE 4:30 PM, ON DAY OF MEETING TO CONFIRM IF PETITION IS BEING HEARD.

13854808 12/31/19, 1/7/20

NOTICE OF COMMUNITY OUTREACH MEETING
NATURAL AGRICULTURAL PRODUCTS, LLC

Notice is hereby given that Natural Agricultural Products, LLC, will hold a Community Outreach Meeting on January 14, 2020 at The Ray's Family Restaurant, 9 Winter Street, Brockton, MA 02302 at 5:30 PM to discuss the proposed siting of a Commercial Grow Operation at 53 Spark Street, Brockton, MA 02302. Natural Agricultural Products, LLC intends to apply for one or more of the following Adult-Use Marijuana Establishment licenses: Marijuana Cultivator, Marijuana Product Manufacturer, Marijuana Research Facility, at 53 Spark Street, Brockton, Massachusetts 02302 pursuant to M.G.L. Ch. 940 and Chapter 55 of the Acts of 2017, and other applicable laws and regulations promulgated thereunder, including those promulgated hereunder by the Massachusetts Cannabis Control Commission.

Topics to be discussed at the meeting will include, but not be limited to:

1. Plans for maintaining a secure facility;
2. Plans to prevent diversion to minors;
3. Plans to positively impact the community; and
4. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

Natural Agricultural Products, LLC.

Gary Leonard
President / CEO

13861016 1/7/20

Help
Jerry's Kids
take the
next step.

MDA is making bold
inroads and gaining greater
understanding of muscular
dystrophy. With your help,
we're providing the best
and the brightest hope for
all of Jerry's Kids and their
families.

MDA

Legals

divorce

Jackson/285 Forest Avenue
**COMMONWEALTH OF MASSACHUSETTS
LAND COURT
DEPARTMENT OF THE TRIAL COURT
Docket No. 19 SM 006175
ORDER OF NOTICE**

To:
Gregory Jackson
Florence S Jackson

and to all persons entitled to the benefit of the Servicemembers' Civil Relief Act, 50 U.S.C. c. 50 §3901 (et seq):

Wells Fargo Bank, National Association, as Trustee for Securitized Asset Backed Receivables, LLC Trust 2006-0P1, Mortgage Pass-Through Certificates, Series 2006-CP1

claiming to have an interest in a Mortgage covering real property in Brockton, numbered 285 Forest Avenue, given by Gregory Jackson to H&R Block Mortgage Corporation, dated June 30, 2005, and recorded in Plymouth County Registry of Deeds in Book 30872, Page 21, and now held by the Plaintiff by assignment, has/have filed with this court a complaint for determination of Defendant's/Defendants' status.

If you now are, or recently have been, in the active military service of the United States of America, then you may be entitled to the benefits of the Servicemembers' Civil Relief Act. If you object to a foreclosure of the above-mentioned property on that basis, then you or your attorney must file a written appearance and answer in this court at Three Pemberton Square, Boston, MA 02108 on or before February 3, 2020, or you may lose the opportunity to challenge the foreclosure on the grounds of non-compliance with the Act.

Witness: GORDON H. PIER Chief Justice of this court on December 20, 2019.

Attest: Deborah J. Patterson
12-009891 / FC03
Enterprise 1/7/2020
1313660326

LEGAL
ADVERTISING/
CONTACTS

For rates and to place a legal advertisement
Call 1-800-624-7355
ext.6930
or
email
legal@wickedlocal.com

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WICKED LOCAL

Legals

divorce

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Plymouth Probate and Family Court
Docket No. PL1900840DR
DIVORCE
SUMMONS BY PUBLICATION
AND MAILING

Elette Apollon
vs.
Alfred Andre

To the Defendant:

The Plaintiff has filed a Complaint for Divorce requesting that the Court grant a divorce for irretrievable breakdown grant him/her custody of the children)

An Automatic Restraining Order has been entered in this matter preventing you from taking any action which would negatively impact the current financial status of either party. SEE Supplemental Probate Court Rule 411.

You are hereby summoned and required to serve upon:

Rosaline Jeanne Bazalaiz Esq.
Attorney at Law
10 Holden St
Suite 7
Malden, MA 02148

your answer, if any, on or before 01/21/2020. If you fail to do so, the court will proceed to the hearing and adjudication of this action. You are also required to file a copy of your answer, if any, in the office of the Registrar of this Court.

Witness, Hon. Edward G. Boyle, First Justice of this Court.

Date: December 9, 2020

Matthew J. McDonough
Registrar of Probate

13859442 1/7/20

BUSINESS SERVICES

Roofing & Gutters
WEATHERITTE ROOFING
Many roof repairs under \$800. 30 year New Roofs. Free roof/gutter inspection. Porches. All rotted wood replaced. Ins. Reg 15829.
508-942-4200
weatheritte@roffing.com

Rubbish Removal

\$ CASH \$
Paid for Junk Cars, Vans, Truck 5 & Heavy Equipment
No title, no key, no problem!
Immediate Pick up
508-388-4062

RICH'S REMOVAL
Attics, Cellars, Yards
Garages. Want it gone or just moved? Free Est. 781-688-3832

CORD OF WOOD
128 cu. ft. Seasoned
\$250 delivered.
508-217-1085

Make money fast with a quick action classified ad listing for good deals on hundreds of ads from clothing to automobiles! That's what the classifieds bring every day.

Visit the Classifieds online!

The Enterprise
WICKED LOCAL.com
www.enterpriseneeds.com

General Help

General Help

Earn Extra Cash
Patriot Ledger Adult Delivery Routes available.
Earn \$800-\$1200 a Month
• Get extra cash for those past due bills or that new car!
• Get that needed exercise • Great supplemental income
• Work as your own boss • Help with holiday bills
You must be able to deliver newspapers in the early morning/afternoon Monday through Friday and early morning on Saturday. You must have a reliable vehicle, valid Massachusetts Driver License and Registration and the desire to provide top-notch service to our customers. Pick up times for newspapers are 7:00 am to 1:00 pm Monday-Friday and Saturday 2:30am to 6:00 am. Routes are available in the following areas:
• Hull • Rockland • Schuette
• Braintree • Weymouth
Call Today.
You could be making money tomorrow!
617-786-7241

Miscellaneous for Sale
DETAILED PORCELAIN ASIAN DOLL from show collection. 20" high, like new. \$30. 617-479-4009.

KITCHEN TABLE with 4 chairs and leaf. Solid Oak. \$75 firm. 781-335-3044

PROFESSIONAL GYM SIZE RECURRENT BIKE \$75/bio. 508-783-4246

RENTALS
Rooms for Rent

BRIDGEWATER - Renov, safe, incl. util., fridge, micro Great location. From \$155/wk. 508-807-0320

BRIDGEWATER - Renov, safe, incl. util., fridge, micro Great location. From \$155/wk. 508-807-0320

Apartment
LOOK!
BROCKTON/Metro South 1, 2 & 3 Bedrooms. No fee. 1st & security, 508-587-3349

BROCKTON
Studio, 1, 2, & 3 BR. Exp. cond. & loc. Sect 8 approx. 508-587-5745

EASTON, SO. 55+
apt. bldg. 1 BR \$1900 & 2 BR, 1 BA \$2600. Incl. Heat, hot wtr & use of all amenities. 508-238-5540.

Merchandise
Automotive

CASH FOR CARS
508-577-0073

Firewood

Make money fast with a quick action classified ad listing for good deals on hundreds of ads from clothing to automobiles! That's what the classifieds bring every day.

Visit the Classifieds online!

The Enterprise
WICKED LOCAL.com
www.enterpriseneeds.com

**NOTICE OF COMMUNITY OUTREACH MEETING
NATURAL AGRICULTURAL PRODUCTS, LLC**

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Topics to be discussed at the meeting will include, but not be limited to:

1. Plans for maintaining a secure facility;
2. Plans to prevent diversion to minors;
3. Plans to positively impact the community; and
4. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

Natural Agricultural Products, LLC.

Gary Leonard
President / CEO

13851016 1/7/20

NOTICE OF COMMUNITY OUTREACH MEETING
NATURAL AGRICULTURAL PRODUCTS, LLC

Notice is hereby given that Natural Agricultural Products, LLC. will hold a Community Outreach Meeting on January 14, 2020 at Tin Ray's Family Restaurant, 9 Winter Street, Brockton, Ma 02302 at 5:30 PM to discuss the proposed siting of a Commercial Grow Operation at 53 Spark Street, Brockton, Ma 02302. Natural Agricultural Products, LLC intends to apply for one or more of the following Adult-use Marijuana Establishment licenses: Marijuana Cultivator; Marijuana Product Manufacturer; Marijuana Research Facility, at 53 Spark Street, Brockton, Massachusetts 02302 pursuant to M.G.L. Ch. 94G and Chapter 55 of the Acts of 2017, and other applicable laws and regulations promulgated thereunder, including those promulgated thereunder by the Massachusetts Cannabis Control Commission.

Topics to be discussed at the meeting will include, but not be limited to:

1. Plans for maintaining a secure facility;
2. Plans to prevent diversion to minors;
3. Plans to positively impact the community; and
4. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

A copy of this notice is on file with the City Clerk, located at the Brockton City Hall, 45 School Street, Brockton, Ma 02302, and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred 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.

Natural Agricultural Products, LLC.



Gary Leonard
President / CEO

RECORDED
JAN 7 20 PM 1 13 4
505 10V 13 4

Debit Card Remit'd
(Card Name: VISA)
(Account #: XXXXXXXXXX3127)
(Approval #)
(Transaction #: 500)
(Receipt #: 020829)
(Debit Card Purchase: \$246.05)
(Cash Back: \$0.00)
(AID: A000000980840)
(AL: US DEBIT)
(PIN: Verified)
chip

Total: \$246.05

USPS Return Receipt # (9590940244028248731717)
First-Class Mail® 1 \$0.55
Letter (Domestic)
(NORTH EASTON, MA 02356)
(Estimated Delivery Date)
(Thursday 01/09/2020)
Certified (USPS Certified Mail #)
(70181130000122186830)
Return Receipt (USPS Return Receipt #)
(9590940244028248731731)
First-Class Mail® 1 \$0.55
Letter (Domestic)
(BROCKTON, MA 02303)
(Weight: 0 Lb 0.50 Oz)
(Estimated Delivery Date)
(Thursday 01/09/2020)
Certified (USPS Certified Mail #)
(70181130000122186854)
Return Receipt (USPS Return Receipt #)
(9590940244028248731748)
Affixed Postage (Affixed Amount: \$0.55)
First-Class Mail® 1 \$0.55
Letter (Domestic)
(ROCKLAND, MA 02370)
(Weight: 0 Lb 0.50 Oz)
(Estimated Delivery Date)
(Thursday 01/09/2020)
Certified (USPS Certified Mail #)
(70181130000122186861)
Return Receipt (USPS Return Receipt #)
(9590940244028248731755)
First-Class Mail® 1 \$0.55
Letter (Domestic)
(BROCKTON, MA 02302)
(Weight: 0 Lb 0.50 Oz)
(Estimated Delivery Date)
(Thursday 01/09/2020)
Certified (USPS Certified Mail #)
(70181130000122186878)
Return Receipt (USPS Return Receipt #)
(9590940244028248731762)
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Letter (Domestic)
(BROCKTON, MA 02302)
(Weight: 0 Lb 0.40 Oz)
(Estimated Delivery Date)
(Thursday 01/09/2020)
Certified (USPS Certified Mail #)
(70181130000122186885)
Return Receipt (USPS Return Receipt #)
(9590940244028248731779)
Total: \$246.05

BROCKTON
120 COMMERCIAL ST
BROCKTON, MA 02302-9998
240952-0401
(800) 275-8777
01/07/2020 02:56 PM

Product	Qty	Unit Price	Price
First-Class Mail® Letter (Domestic) (BROCKTON, MA 02302) (Weight: 0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 01/09/2020) Certified (USPS Certified Mail #) (70181130000122182559) Return Receipt (USPS Return Receipt #) (9590940244028248746858)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (EAST BRIDGEWATER, MA 02333) (Weight: 0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 01/09/2020) Certified (USPS Certified Mail #) (70181130000122182542) Return Receipt (USPS Return Receipt #) (9590940244028248746827)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (BROCKTON, MA 02302) (Weight: 0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 01/09/2020) Certified (USPS Certified Mail #) (70181130000122186441) Return Receipt (USPS Return Receipt #) (9590940244028248751005)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (BROCKTON, MA 02303) (Weight: 0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 01/09/2020) Certified (USPS Certified Mail #) (70181130000122186434) Return Receipt (USPS Return Receipt #) (9590940244028248750992)	1	\$0.55	\$0.55
First-Class Mail® Letter (Domestic) (NORTH PEMBROKE, MA 02358) (Weight: 0 Lb 0.50 Oz) (Estimated Delivery Date) (Thursday 01/09/2020) Certified (USPS Certified Mail #) (70181130000122186427) Return Receipt (USPS Return Receipt #) (9590940244028248751296)	1	\$0.55	\$0.55

NOTICE OF COMMUNITY OUTREACH MEETING
NATURAL AGRICULTURAL PRODUCTS, LLC

Notice is hereby given that Natural Agricultural Products, LLC. will hold a Community Outreach Meeting on January 14, 2020 at Tin Ray's Family Restaurant, 9 Winter Street, Brockton, Ma 02302 at 5:30 PM to discuss the proposed siting of a Commercial Grow Operation at 53 Spark Street, Brockton, Ma 02302. Natural Agricultural Products, LLC intends to apply for one or more of the following Adult-use Marijuana Establishment licenses: Marijuana Cultivator; Marijuana Product Manufacturer; Marijuana Research Facility, at 53 Spark Street, Brockton, Massachusetts 02302 pursuant to M.G.L. Ch. 94G and Chapter 55 of the Acts of 2017, and other applicable laws and regulations promulgated thereunder, including those promulgated thereunder by the Massachusetts Cannabis Control Commission.

Topics to be discussed at the meeting will include, but not be limited to:

1. Plans for maintaining a secure facility;
2. Plans to prevent diversion to minors;
3. Plans to positively impact the community; and
4. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

A copy of this notice is on file with the City Clerk, located at the Brockton City Hall, 45 School Street, Brockton, Ma 02302, and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred 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.

Natural Agricultural Products, LLC.



Gary Leonard
President / CEO

RECEIVED
JAN 7 7:20 PM 174
505 10V 15:11

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, GARY E. LEONARD, (insert name) attest as an authorized representative of Natural Agricultural Products (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 14, 2020 (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 JANUARY 7, 2020 (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 JANUARY 7, 2020 (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 JANUARY 7, 2020 (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.

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, GARY E. LEONARD, (insert name) certify as an authorized representative of Natural Agricultural Products (insert name of applicant) that the applicant has executed a host community agreement with CITY OF BROCKTON (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, BILL CARPENTER, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for CITY OF BROCKTON (insert name of host community) to certify that the applicant and CITY OF BROCKTON (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 4/1/19 (insert date).



Signature of Contracting Authority or
Authorized Representative of Host Community

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

The following is a plan by Natural Agricultural Products to positively impact areas of disproportionate impact, as defined by the Commission 935 CMR 500.1010(1)(a)(11); 935 CMR 500.102(2)(b)(10).

Natural Agricultural Products, LLC. and its planned cultivation and manufacturing facility are located in the city of Brockton which is identified as a Community of Disproportionate Impact by the Cannabis Control Commission in its Guidance for Identifying Areas of Disproportionate Impact. The President of Natural Agricultural Products has joined the Montello Business Association and the Village Neighborhood Association which both oversee the safety, security, and businesses in the area which our intended facility is located. Their goals are to implement improvements that are necessary for the safety, preservation of historic sites and promote small businesses to attract patrons to the Montello Business District.

GOAL – The goal of Natural Agricultural Products to positively impact areas of disproportionate impact is to continue our involvement with the Village Neighborhood Association. Natural Agricultural Products will collaborate with and offer the Village Neighborhood Association the opportunity to allow us to provide business assets such as time, organization skills, or finances to assist with two (2) events to positively impact the neighborhood at the local park, ‘Tukis Park’.

PROGRAM – Our program to positively impact the community in which the Natural Agricultural Products facility is located is to organize a meeting with the Village Neighborhood Association to suggest and assist with the following:

- (a) A ‘Tukis Park Clean-up Day’
- (b) A fundraising event with proceeds to be used to enhance the park with trees, gardens, benches or other merchandises that will beautify the area.

Natural Agricultural Products will produce **(NATURAL AGRICULTURAL PRODUCTS INTENDS TO ADVERTISE FOR THESE EVENTS FOR ONE MONTH BEFORE THE EVENT WILL TAKE PLACE. ADVERTISEMENT WILL INCLUDE POSTERS HUNG IN LOCAL STOREFRONTS)** for these activities and supply materials needed to complete the event.

MEASUREMENTS – Natural Agricultural Products will measure the success of our goal by utilizing the metrics listed below.

- (a) Written verification by the Village Neighborhood Association that the events were held in the manner stated above.
- (b) Photographs and Social Media confirmation of the above stated events

- (c) Natural Agricultural Products will request that the local newspaper, The Enterprise' document the events.
- (d) **QUANTIFYABLE METRICS THAT WILL BE USED ARE:
TRACK THE AMOUNT OF TIME NAP EMPLOYEES SPEND AT
THE SITE. WE WILL ALSO COMPUTE VISITOR COUNTS TO
BE USED AS QUANTIFYABLE METRICS.**

**THIS PLAN TO POSITIVELY IMPACT AN AREA OF
DISPROPORTIONATE IMPACT IS PRACTICAL AND NATURAL
AGRICULTURAL PRODUCTS INTENDS TO FULLY IMPLEMENT IT
AND ACHIEVE SUCCESS. WE WILL EVALUATE THE PROGRESS OF
THIS PLAN QUARTERLY IN PREPARATION FOR DEMONSTRATING
SUCCESS UPO LICENSE RENEWAL.**

**NATURAL AGRICULTURAL PRODUCTS COMPLIES WITH THE FOLLOWING
STATEMENTS.**

Natural Agricultural Products 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 Marijuana Establishments.

Natural Agricultural Products states that any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Joanne Zygmunt
President
Village Neighborhood Association
12 Welsford Street
Brockton, MA 02302

March 4, 2020

Mr. Gary Leonard
President
Natural Agricultural Products
82 Brian Drive
Brockton, MA 02301

Dear Mr. Leonard:

Village Neighborhood Association (VNA) is a nonprofit, volunteer-led community group focused on improving the Village area of Brockton. We believe everyone deserves to live in a beautiful, healthy, safe, and vibrant neighborhood. We advocate for our neighborhood, inform and empower residents, and host community events.

Representatives of Natural Agricultural Products (NAP) have come to several of our association's meetings to introduce themselves and present business plans, and they have also participated in park clean-up events. We thank them for their participation and welcome their commitment to improving Brockton's Village through responsible business efforts.

We would be pleased to accept general donations from NAP in support of our mission. Benefits or 'perks' of such donations shall be negotiated on a case-by-case basis. We would also welcome NAP's participation in VNA-led events that do not target children specifically. NAP's participation in these VNA-led events shall be negotiated on a case-by-case basis. The number of annual events varies, but we aim to have a schedule early each year.

Please note that this letter does not constitute an official VNA endorsement of NAP; our membership has not and does not intend to vote on 'endorsement.' We welcome NAP as a responsible business to our neighborhood, wish them luck in their venture, and look forward to working together to improve the Village area of Brockton.

Sincerely,



Joanne Zygmunt
(508) 649-3479
villageNABrockton@gmail.com



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner
mass.gov/dor

Letter ID: L1135827328
Notice Date: February 21, 2019
Case ID: 0-000-457-420



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



NATURAL AGRICULTURAL PRODUCTS, LL
4 MAIN ST STE 215
BROCKTON MA 02301-4027

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Use the confirmation code below to print another copy of this letter or to review your submission.



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner
mass.gov/dor

Letter ID: L1135827328
Notice Date: February 21, 2019
Case ID: 0-000-457-420



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



NATURAL AGRICULTURAL PRODUCTS, LL
4 MAIN ST STE 215
BROCKTON MA 02301-4027

Confirmation Code: b9bb42

**BYLAWS
OF
NATURAL AGRICULTURAL PRODUCTS, LLC
A Massachusetts Corporation
Adopted As of March 18, 2019**

**ARTICLE 1
CONTACT INFORMATION**

- Section 1.** The registered office of this corporation shall be in the City of Brockton, State of Massachusetts. The address of the registered office is 82 Brian Drive.
- Section 2.** The Principal Officers and Owners of this Corporation are:
- | | |
|---------------------------|-----------------------------|
| Gary E. Leonard | Kathryn M. Redden |
| 82 Brian Drive | 51 Dolan Circle |
| Brockton, MA 02301 | E. Taunton, MA 02718 |
- Section 3.** Gary E. Leonard holds 51% interest of the Corporation
Kathryn M. Redden holds 49% interest of the Corporation

**ARTICLE 2
TERMS AND PURPOSE OF THE LLC.**

- Section 1.** The term in which Natural Agricultural Products, LLC. will exist is not specified. It will continue to be a corporation until both principal owners agree to dissolve the corporation.
- Section 2.** The purpose of Natural Agricultural Products, LLC. is to operate as a Cultivation and Manufacturing company in the Marijuana industry.

**ARTICLE 3
RIGHTS AND RESPONSIBILITIES OF PRINCIPAL OWNERS**

- Section 1.** The business and affairs of Natural Agricultural Products, LLC. shall be managed and overseen by The Principal Owners also known as the Executive Managers of the company. They will have the responsibility to hire professional managers to run the day to day operation of the Company. All employees will report directly to their department managers. All Department Managers will report directly to the Executive Management Team.
- Section 2.** Annual meeting of Executive Management Team will be held on June 1 of each year.

Section 3. Executive Management Team regular and special meetings may be held without notice at such time and at such place determined by the Team. When required, Managers and/or employees will attend meetings.

Section 3. Regular or special meetings to be held by Department managers and employees may be held without notice. A member of the Executive Management Team will be present at all such meetings.

ARTICLE 4

CONCERN RESOLUTION

All resolutions to company concerns must be agreed upon by all members of the Executive Management Team.

ARTICLE 5

DISTRIBUTION OF PROFITS

Section 1. The Executive Management Team will have full discretion of how profits are distributed to all employees of Natural Agricultural Products, LLC.

Section 2. All employees will receive compensation in compliance with Massachusetts Employment Laws. Employee compensation for their service will be determined by the Executive Management Team.

Section 3. Raises, bonuses and employee incentives will be determined by the Executive Management Team.

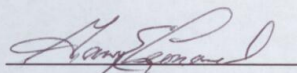
ARTICLE 6

AMENDMENTS

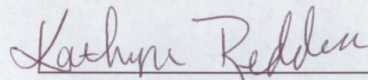
These bylaws may be amended, added to, or repealed as the company grows and changes. All amendments, additions and repeals will only be permissible with the agreement of both Principal Owners, Gary E. Leonard and Kathryn M. Redden.

Gary E. Leonard

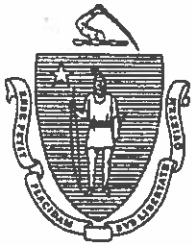
Kathryn M. Redden



Date 4-9-2019



Date 4-9-2019



William Francis Galvin
Secretary of the
Commonwealth

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

November 15, 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

NATURAL AGRICULTURAL PRODUCTS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **February 4, 2018**.

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are:
KATHRYN M. REDDEN, GARY EDMUND LEONARD

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **KATHRYN M. REDDEN, GARY EDMUND LEONARD**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **KATHRYN M. REDDEN, GARY EDMUND LEONARD**

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

**OPERATING AGREEMENT FOR MEMBER-MANAGED
NATURAL AGRICULTURAL PRODUCTS, LLC**

INTRODUCTION

The undersigned are all of the Members of Natural Agricultural Products, a Limited Liability Company formed under the laws of the Commonwealth of Massachusetts. The undersigned hereby adopt the following Operating Agreement pursuant to the LLC laws of the Commonwealth of Massachusetts, and do hereby certify and agree as follows:

ARTICLE I – NAME

1.1 Name of Business: The name of the Company is Natural Agricultural Products, LLC.

ARTICLE II. – OFFICES AND REGISTERED AGENT

2.1 Principal Office: The principal office of the Company is located at 82 Brian Drive, Brockton, MA 02301. The Company may have other offices, inside or outside the Commonwealth of Massachusetts as the Members may designate.

2.2 Registered Office: The registered office of the Company in the Commonwealth of Massachusetts is located at 9 Burns Avenue, Canton, MA 02021. The registered agent of the Company for service of process at that address is Richard R. Staiti, Esq.

ARTICLE III. – BUSINESS PURPOSE

3.1 Business Purpose: The purpose of the Company is to engage in any lawful business that may be engaged in by a limited liability company organized under the LLC laws of the Commonwealth of Massachusetts.

ARTICLE IV. – MEMBERS

4.1 Members: The names of each initial Member, their capital contributions, and percentage interests are as follows:

<u>Name</u>	<u>Capital Contribution</u>	<u>Percentage Interest</u>
<u>Gary Edmund Leonard</u>	<u>\$0.00</u>	<u>51.0%</u>
<u>Kathryne M. Redden</u>	<u>\$0.00</u>	<u>49.0%</u>

4.2 Additional Members: Additional Members may be admitted upon the consent of a majority share of all Members.

4.3 Withdrawing: A Member may withdraw from the Company upon six months written notice to each remaining Member.

ARTICLE V. – MEMBERS' CAPITAL ACCOUNTS

5.1 Capital Accounts: The Company will maintain a separate capital account for each Member. Each Member's capital account will reflect the Member's capital contributions and increases for the Member's share of any net income or gain of the Company. Each Member's capital account will also reflect decreases for distributions made to the Member and the Member's share of any losses and deductions of the Company.

- a) Each Member's capital account will be increased by: 1) the amount of money or the fair market value of property contributed by the Member to the Company (net of any liabilities secured by such contributed property that the Company is considered to assume or take subject to), 2) the amount of any Company liabilities assumed by the Member, and 3) allocations to the Member of profit, income, or gain.
- b) Each Member's capital account will be decreased by: 1) the amount of money and the fair market value of property distributed to the Member by the Company (net of any liabilities secured by such contributed property that the Company is considered to assume or take subject to), and 2) allocations to the Member of losses, deductions, and expenses.
- c) In the event of a permitted sale or exchange of an interest in the Company, the capital account of the transferor will become the capital account of the transferee.
- d) The manner in which capital accounts are to be maintained pursuant to this Operating Agreement is intended to comply with the requirements of the Internal Revenue Code Sec. 704(b) and the regulations thereunder. It is the specific intent of the Members that all adjustments as may be required pursuant to Sec. 704(b), and any restrictions thereunder, be made, so as to cause the allocations prescribed hereunder to be respected for tax purposes.

5.2 Fiscal Year: The fiscal year of the Company will be June 30th. The books and records of the Company will be maintained in accordance with generally accepted accounting principles and Sec. 704(b) of the Internal Revenue Code and the regulations thereunder.

ARTICLE VI. – ALLOCATIONS AND DISTRIBUTIONS

6.1 Allocations and Distributions: All items of Company income, gain, loss, deduction, credit, or the like will be allocated among the Members in accordance with their respective percentage interests with the exception of cultivation and retail profits described in Section 6.3.

6.2 Distributions of Cash or Assets: Distributions of cash or other assets may be made to the Members from time to time. All distributions will be made to the Members in accordance with their respective percentage interests with the exception of cultivation and retail profits described in Section 6.3.

6.3 Sharing of Profits Among Members for Cultivation and Retail: The Members agree that the profits from retail sales of marijuana shall be shared as follows:

- a) Gary Edmund Leonard: 50.0%
- b) Kathryn M. Redden: 50.0%

The Members agree that the profits from the cultivation of marijuana shall be shared as follows:

	Kathryne M. Redden	Gary Edmund Leonard
Fiscal Year 1	100%	0%
Fiscal Year 2	75%	25%
Fiscal Year 3	50%	50%

ARTICLE VII. – ASSIGNMENT OF MEMBERSHIP INTERESTS

7.1 Assignment of Membership Interests: A Member may assign his or her membership interest in the Company in whole or in part. The assignment of a membership interest does not in and of itself entitle the assignee to become a Member. The assignee is only entitled to receive, to the extent assigned, the distributions the assigning Member would otherwise be entitled to, and the assignee will only become an assignee of a membership interest and not a substitute Member.

7.2 Substitute Members: An assignee of a membership interest will be admitted as a substitute Member and will be entitled to all the rights and powers of the assignee only if a majority share of the other Members unanimously consent. If admitted, the substitute Member has, to the extent assigned, all of the rights and powers, and is subject to all of the restrictions and liabilities of a Member.

ARTICLE VIII. – VOTING; MEMBERS MEETINGS

8.1 Voting: Except to the extent provided to the contrary in this Operating Agreement, all Members will be entitled to vote on any matter submitted to a vote of the Members.

- a) Unless a greater vote is required by the LLC laws of the Commonwealth of Massachusetts, the Articles of Organization, or this Operating Agreement, the affirmative vote or consent of a majority in interest of the Members present at meeting at which a quorum is present will be the act of the Members.
- b) The consent of a majority share of all Members will be required to approve the following: 1) the dissolution of the Company, 2) the merger of the Company; 3) the conversion of the Company, 4) the authorization or ratification of acts that would otherwise violate the duty of loyalty, 5) an amendment to the Articles of Organization, 6) the sale, exchange, lease, or other transfer of all or substantially all of the assets of the Company other than in the ordinary course of business, 6) the compromise of an obligation to make a contribution, 7) the making of interim distributions, 8) the admission of a new Member, 9) the use of the Company's property to redeem an interest subject to a charging order, 10) an amendment to the Operating Agreement.

8.2 Annual Meetings of Members: Annual meetings of Members may be held at such time and at such place as the Members designate. Special meetings of Members may be called at the request of any Member.

8.3 Notice of Meetings: The Company will deliver notice stating the date, time, place, and purposes of any meeting to each Member entitled to vote at the meeting. Notice will be given not less than 10 days nor more than 30 days before the date of that meeting.

8.4 Quorum: A majority in interest, represented in person or by proxy, will constitute a quorum for the transaction of business at a meeting of Members.

8.5 Unanimous Written Consent: Any action required or permitted to be taken at a meeting of the Members may be taken without a meeting, if consents in writing, setting forth the action taken, are signed by all Members entitled to vote at the meeting.

8.6 Voting by Proxy: A Member may appoint a proxy to vote or otherwise act for the Member by signing an appointment instrument either personally or by the Member's attorney-in-fact.

8.7 Meeting Participation: A Member may participate in a meeting by means of telephone conference or similar equipment.

ARTICLE IX. – MANAGEMENT OF THE COMPANY

9.1 Management: The Company will be managed by all of its Members.

- a) Subject to the delegation of rights and powers provided for herein, the Members will have the sole right to manage the business of the Company and will have all powers and rights necessary, appropriate or advisable to effectuate and carry out the purposes and business of the Company.
- b) The Members may appoint a President, Treasurer, Secretary, or such other Officers as they may deem necessary or appropriate.
- c) The Members may appoint, employ, or otherwise contract with other persons or entities for the transaction of business of the Company or the performance of services for or on behalf of the Company as they may deem necessary or appropriate. The Members may delegate to any Officer of the Company or to any other person or entity such authority to act on behalf of the Company as they may deem appropriate.
- d) Any Member, Officer, or other person specifically authorized by the Members may execute any contract or other agreement or document on behalf of the Company and may execute and file on behalf of the Company with the secretary of state any document required or permitted to be filed under the LLC laws of the Commonwealth of Massachusetts.

ARTICLE X. – STANDARD OF CONDUCT; INDEMNIFICATION

10.1 Conduct: A Member owes the Company and its other members a duty of loyalty and a duty of care. The duty of loyalty is limited to: 1) accounting to the Company and holding as trustee for it, any property, profit, or benefit derived by the Member in the conduct or winding up of the Company's business, 2) refraining from dealing with the Company as or on behalf of a party having an interest adverse to the Company, and 3) refraining from competing with the Company. The duty of care is limited to refraining from engaging in grossly negligent or reckless conduct, intentional misconduct, or a knowing violation of law. A Member will discharge his or her duties consistently with the obligation of good faith and fair dealing.

10.2 Indemnification: Except as otherwise provided in this Article, the Company will indemnify any Member and may indemnify any employee or agent of the Company who was or is a party or is threatened to be made a party to any action, suit or proceeding, other than an action by or in the right of the Company, by reason of the fact that such person is or was a Member, employee or agent of the Company against expenses, including attorney's fees, judgments, penalties, fines, and amounts paid in settlement actually and reasonably incurred by such person in connection with the action, suit or proceeding, if the person met the standard of conduct set forth above in this Article.

- a) To the extent that a Member, employee, or agent of the Company has been successful on the merits or otherwise in defense of an action, suit, or proceeding, such person will be indemnified against actual and reasonable expenses, including attorney's fees, incurred by such person in connection with the action, suit, or proceeding and any action, suit or proceeding brought to enforce the mandatory indemnification provided herein. Any indemnification permitted under this Article, unless ordered by a court, will be made by the Company only as authorized in the specific case upon a determination that the indemnification is proper under the circumstances because the person to be indemnified has met the applicable standard of conduct. That determination will be made by a majority percentage share vote of the Members who are not parties or threatened to be made parties to the action, suit, or proceeding.
- b) No indemnification will be provided to any Member, employee, or agent of the Company for or in connection with the receipt of a financial benefit to which such person is not entitled, voting for or assenting to a distribution to Members in violation of this Operating Agreement or the Act, or a knowing violation of law.

ARTICLE XI. – DURATION; DISSOLUTION

11.1 Duration: The Company will continue in existence until dissolved pursuant to the LLC laws of the Commonwealth of Massachusetts.

11.2 Dissolution: The Company will be dissolved and have its affairs wound up and terminated upon the determination of a majority percentage share of all of the Members to dissolve the company, or upon the occurrence of any other event causing a dissolution of the Company pursuant to the LLC laws of the Commonwealth of Massachusetts.

11.3 Winding Up: Upon dissolution, the Company will cease carrying on its business and affairs and will commence the winding up of the Company's business and affairs and complete the winding up as soon as practicable. Upon the winding up of the Company, the assets of the Company will be distributed first to creditors to the extent permitted by law in satisfaction of the Company's debts, liabilities, and obligations, and second to Members and former Members in satisfaction of liabilities for distributions and in accordance with their percentage interests.

ARTICLE XII. – MISCELLANEOUS PROVISIONS

12.1 Entire Agreement: This Operating Agreement embodies the entire agreement and understanding among the Members with respect to the subject matter within. This Operating Agreement supersedes any and all other agreements, either oral or written, among the Members with respect to the subject matter within.

12.2 Severance: Every provision of this Operating Agreement is intended to be severable. The invalidity or illegality of any particular provision of this Operating Agreement will not affect the other provisions, and this Operating Agreement will be construed in all respects as if such invalid or illegal provisions were omitted.


12.3 Amendments and Revocations: This Operating Agreement may be amended or revoked at any time by the written consent of all of the Members.

12.4 State Law: This Operating Agreement will be governed by, construed, and enforced in accordance with the laws of the Commonwealth of Massachusetts.

Signature Page to Follow

THE UNDERSIGNED, being all of the Members of Natural Agricultural Products, LLC,
evidence their adoption and ratification of the foregoing Operating Agreement of the LLC.

Dated: April 9, 2019



Gary Edmund Leonard, Member



Kathryn M. Redden, Member

Natural Agricultural Products, LLC.

Dually registered with the Secretary of State in MA

EIN #: 82-4298481

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EXECUTIVE SUMMARY

1.0 Cannabis is a new and exciting Industry introduced to Massachusetts by the will of the voting population in 2016. Natural Agricultural Product's business plan has been created to lay out pertinent information gathered from states that have approved the recreational sale of cannabis for a number of years. This business plan will cover our mission, site analysis, trends, demographics, finance, employment, inventory, and marketing strategies. All informational statistics obtained are listed in the appendix on the last page of this report.

Site analysis is based off 80,000 sq. ft. footprint, allowing 60,000 sq. ft. of canopy for cultivation, 15,000 sq. ft. for packaging and manufacturing, and 5,000 sq. ft. of office space. N.A.P. will begin with 6,000 sq. ft. of canopy, and 2,000 for manufacturing, with 3,000 of office space, with future plans of expanding our cultivation center to utilize the entire building as stated above. The timeline goal for all to be at full capacity is 3 years.

Demographic information was obtained from government-reported census websites (census.us and neighborhoodscout.com) compiled into charts as to be easily read, and compared. Marketing information explains strategies, and avenues to explore to identify and target our cliental, and demonstrates the need to retain our customer base. Various websites such as cannabisbusinesstimes.com, forbes.com, mjbizdaily.com, and cannabisconsumer.org were used to analyze the business plan information. The marketing tools suggested were blogs, face book, linked in, twitter, Instagram, snapshot, and other social media sites, which we will use toward marketing to retail establishments.

Cultivation according to newfrontierdata.com the average harvest is \$1,120,100 per acre which breaks down to \$257,623.00 for 10,000 sq. ft., harvesting 3-4 times at average per year, adding \$1,000,000 plus for each 10,000 sq. ft. of canopy. Natural Agricultural Products has the capacity to expand their facility up to 60,000 sq. ft., and plan to be at full capacity within 3 years of operation.

Natural Agricultural Products has researched, and contacted qualified, experienced personal that have the ability to train employee's the rules and regulations provided by the Cannabis Control Commission of Massachusetts. N.A.P. will require that all employees attend seminars pertaining to the 935 CMR 500.00: Adult use of marijuana provided by the Commonwealth of Massachusetts at the company expense. N.A.P. will also conduct continuing educational classes, keeping staff up to date on changes to the regulations, and requirements that the CCC could alter or add in the future as the Industry progresses.

The business plan will cover market needs, trends, and growth, with a strategy to accomplish these goals. Pro-forma, and financial statements are subject to change depending on a variety of circumstances such as growth, expansion, and acquisitions. Our focus is to open one (1) retail dispensary as available, and one (1) cultivation facility in the city of Brockton in 2019, the City of Brockton limits one license to all applicants for any and all tiers of licensing. N.A.P. has the research, and development team working on retail

locations in Fall River, and Taunton, Ma. that has similar demographics and population as Brockton.

Natural Agricultural Products will progress to extractions of cannabis for vape pens, tinctures, ointments, chocolates, candies, etc. These are other revenue streams that N.A.P. will develop within the first year of opening. N.A.P. has had conversations with entrepreneurs that will sell edibles that would accommodate the retail cannabis Industry. The N.A.P sales team will market to these retailers of our large selection of infused edibles, oils, tinctures, and vapes. N.A.P. has chosen the City of Brockton to use as our model for the opening our first cultivation, and manufacturing facility. The model that N.A.P. will use comes from Boulder Co., whereas the population and household medium are close to the same. The difference that you will see in the business plan is the potential to capitalize on the market that abuts the city of Brockton that is 3 times larger than Boulder Colorado. Brockton is considered the hub of the South Shore, also referred to as the gateway to the Cape, and surveys show that most of the residents that live in towns near by originated from Brockton. These are few of the reasons why Brockton was selected to be home to our company.

The N.A.P. plan within 5 years of operation, year (1) have 1 cultivation facility supplying 60,000 sq. ft. of canopy, 15,000 sq. ft. to manufacture, package, and label flower, edibles, tinctures, vapes, and oils, and 5,000 sq. ft. to consolidate office space. After first year we will be looking to open our first retail dispensary, focusing in different communities, such as Fall River, New Bedford, Taunton, and Brockton Ma., We made contact with town officials there, and licenses are available to negotiate a host agreement with them at a timeline suitable for all parties, this would be year two. The start of year three N.A.P. will acquisition all properties that are dispensaries and cultivation centers and rehab the buildings to framework or theme of the neighborhood, in an environmentally friendly manner. The company will covert to clean energy, with the installation of solar and wind power, setting an example to others, and assisting other companies on the process of going green.

2.0 Mission Statement

Natural Agricultural Products, LLC (N.A.P.) is dedicated to providing safe and affordable cannabis products in a professional and secure environment that will meet the needs of our clientele. We are committed to continuing to strengthen our relationship with the cities and towns we locate in by supplying revenue to economically enhance the community and its citizens.

3.0 Site Planning and Analysis

Natural Agricultural Products, LLC plans to open multiple locations. Our focus is Brockton Ma. with our company office located at 4 Main St on the 2nd floor in Suite 215. Dispensaries, and cultivation centers will be located in areas where there is proper zoning and ordinances, no moratorium and with public support. All due diligence will be done before any and all leases are signed to ensure N.A.P. remains compliant at all times.

Our legal team has given an opinion letter attached to this business plan stating that there are no current codes or ordinances prohibiting dispensing operations in our chosen cities and towns, Taunton, Fall River, New Bedford, and Brockton. The administrators, Police Chief, and County Sherriff have been notified of the intention to open recreational marijuana businesses and have no objections.

All parties acknowledge that this is governed by the will of the voters, who have passed legislation to allow for the recreational sale of cannabis within the Commonwealth of Massachusetts (935 CMR 500.000). N.A.P. reserves the right to allow for any local official who has voiced any concerns to be active, sitting members on N.A.P.'s Board of Directors, in order to best address any/all concerns voiced. N.A.P. has also promised total transparency to the police by allowing them to connect to all surveillance cameras within any/all locations operated by Natural Agricultural Products, LLC.

The proposed facilities will be located 500 feet from any school, and any other named business by the Commonwealth, thus abiding by state regulations. The facilities will have discreet signs which will at all times conform to all state and local regulations and ordinances.

Our proposed locations also allow for easy access by public transportation. Our office is within walking distance to both MBTA and BAT Stations and is located directly on a major Commuter Rail line. The dispensaries will be completely compliant with ADA laws, allowing for easy access for our handicapped patrons and doors wide enough for a wheelchair.

All N.A.P. facilities will work closely with the community to become an integral part and will address all specific zoning regulations. Natural Agricultural Products, LLC and its Executive Staff are sensitive to the various issues that have arisen pertaining to cannabis companies throughout the country and promise to remain diligent with our continued compliance at all times.

4.0 Estimated Market Size

Natural Agricultural Products, LLC has conducted countless hours of extensive research on the population within the state, as well as our expected marketplace. With all research done, it's hard to give exact numbers for the market of an industry such as recreational marijuana. All numbers are based off research comprised and analyzed in order to best give an estimated market size for our chosen locations.

Massachusetts has a population of roughly 6.8M residents. Example: our chosen location of Brockton, MA, and its surrounding towns have a total population of about 241,724 people. Of that sum, Brockton has a total of 94,813 people, giving it around 39.2% of the people living in our immediate area. The chart below shows the breakdown of cities/towns in the greater Brockton area for reference:

**All information gathered to be cited on back page*

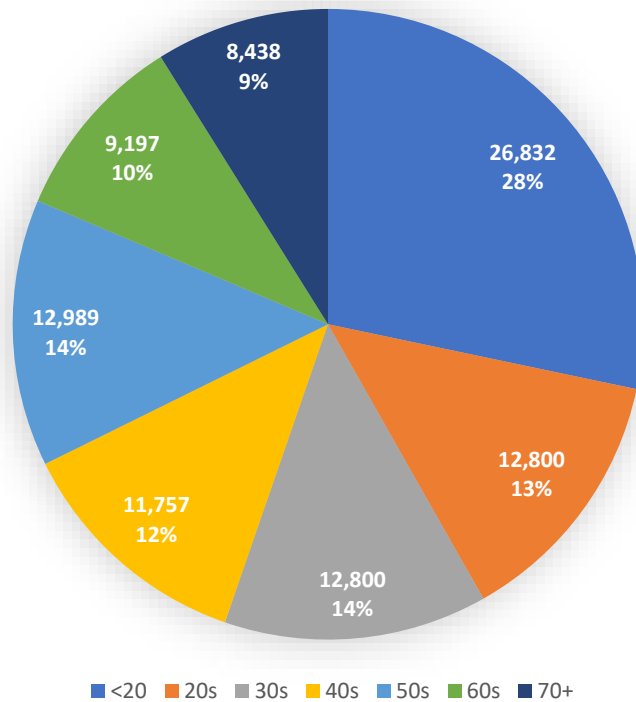
As you will see from the charts on the next pages, Brockton has a vast majority of people in the area, accounting for more people than the 3 next largest cities/towns in the area combined (Stoughton, Bridgewater, and Easton).

4.1 Target Market Segment Strategy

Brockton's vast, and growing population will serve as an even greater benefit to the recreational marijuana industry as according to cannabisconsumer.org 40.79% of consumers are aged 21-35 while 36-45 come in 2nd at 25.75%. These two age brackets take up 66.54% of the market share. Brockton, with a population of roughly 94,813, has 39% of its population (~37,357 people) fall into the target demographic age range with the largest age group in the city (<20 at 28% or ~26,832 people) coming right in behind them, proving sustainability for this industry moving forward throughout the years to come. The following chart will go more into details on the age breakdown of Brockton's population and you'll see just how the demographics of Brockton fall along perfectly with the industry's demographics not only today, but also tomorrow and for years to come:

Cultivation & manufacturing will play a large part in supplying recreational dispensaries in product. The demographics outside and within the city of Brockton gives Brockton the potential market that can exceed other communities. Brockton is considered the hub of the south shore with 4 state highways routes 24, 123, 27, and 28, and with the population growth retail dispensaries will depend on cultivators, and manufacturers to keep up with the demand.

Brockton, MA Population Breakdown by Age



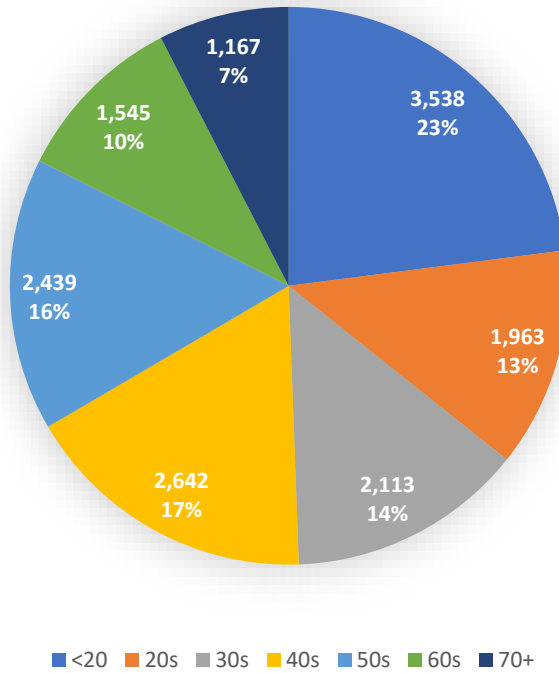
*All information gathered to be cited on back page.

Brockton's market is unique in its size, relative location to other major cities and its ease of public transportation use.

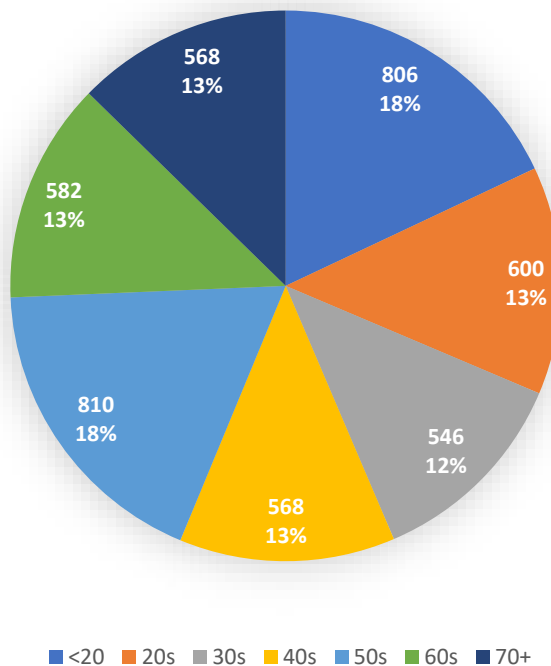
- Over 90,000 people live in Brockton
- ~39% of the city falls within the target demographic for age
- ~28% of the city falls in the age group below the target demographic for age giving sustainability to the industry
- ~25 mi to Boston, MA
- ~1hr. to Providence, RI
- Three commuter rail stations make transportation to and from the City easy
BAT bus station adds additional layer of transportation to/from the City

Data compiled shows the demographics info for neighboring cities/town also align with our target market:

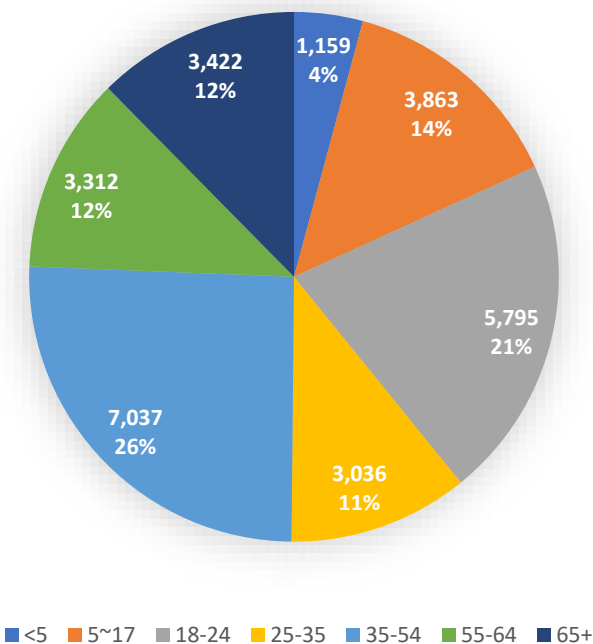
Abington, MA Population Breakdown by Age



Avon, MA Population Breakdown by Age

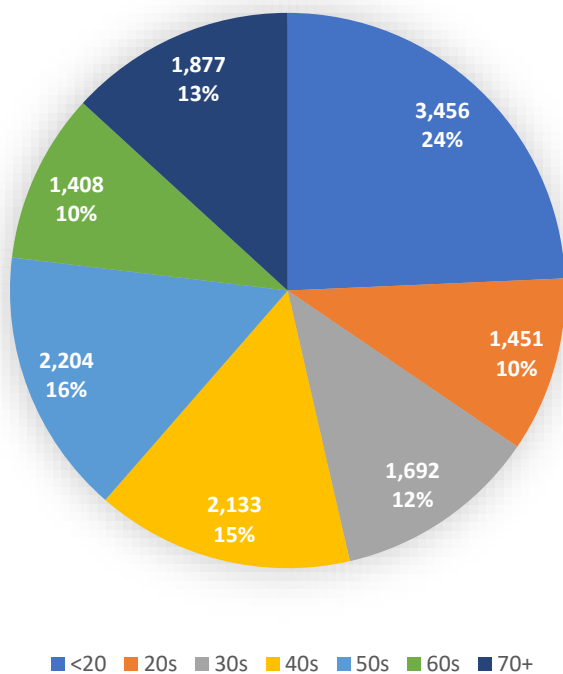


Bridgewater, MA Population Breakdown

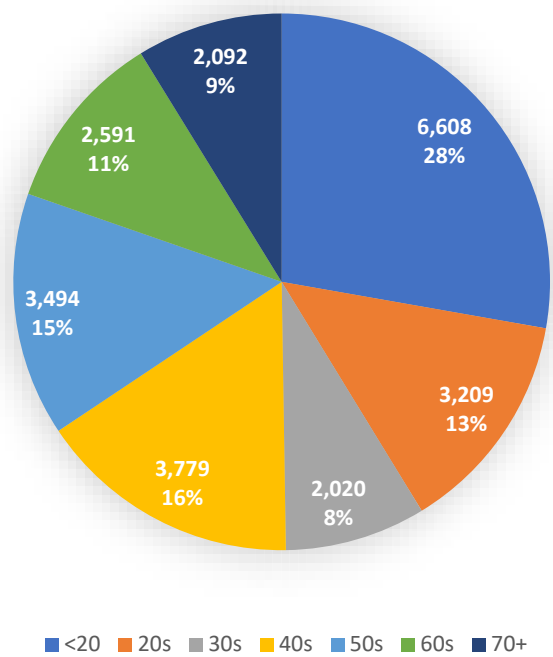


*Data analyzed from neighborhoodscout.com different than other demographics info. Same target market applies.

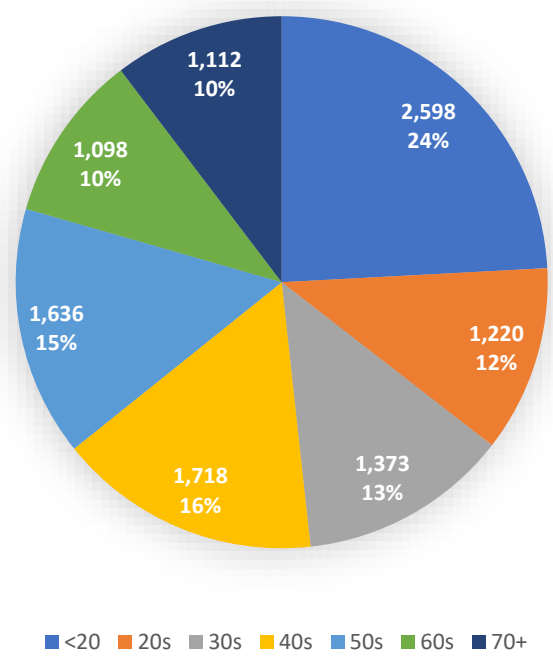
East Bridgewater, MA Population Breakdown by Age



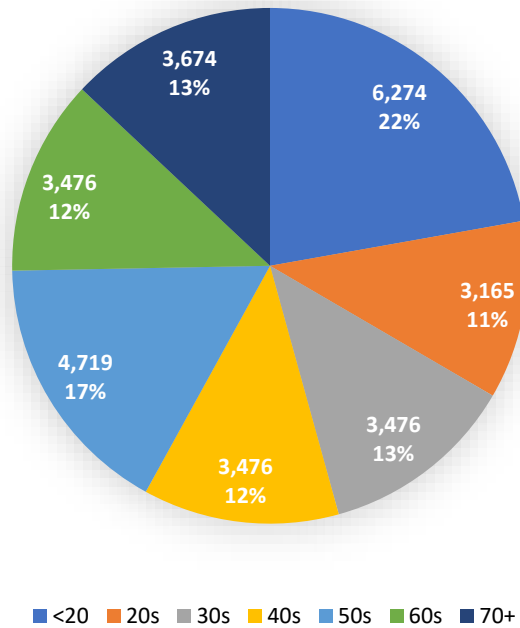
Easton, MA Population Breakdown by Age



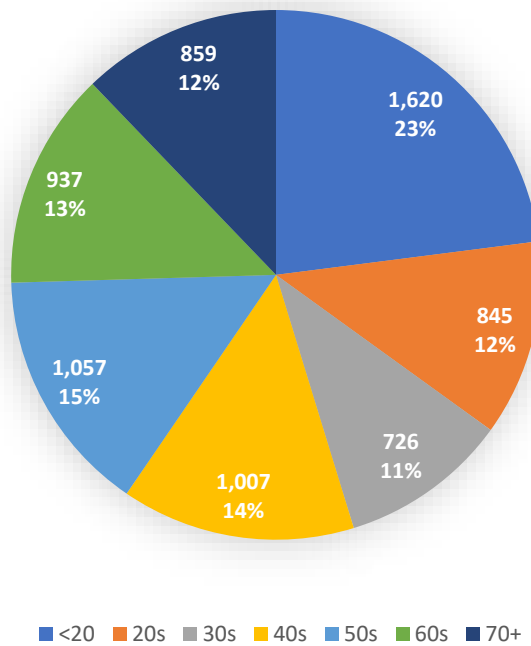
Holbrook, MA Population Breakdown by Age



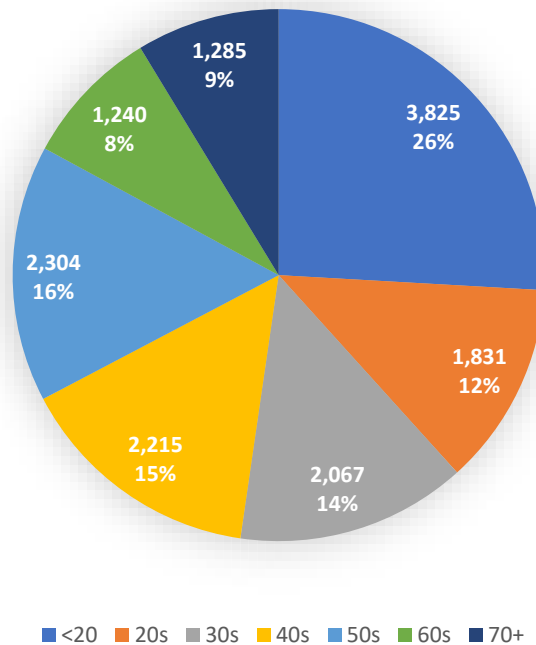
Stoughton, MA Population Breakdown by Age



West Bridgewater, MA Population Breakdown by Age



Whitman, MA Population Breakdown by Age



As demonstrated from the graphs above, our model location of Brockton has a large target market within the City itself, as well as the immediate neighboring cities/town. In just these 10 cities/towns the rough market share would be around 99,060 people.

- Abington – Approximately 6,718 people (~76%)
- Avon – Approximately 1,714 people (~82%)
- Bridgewater – Approximately 15,868 people (~74%)
- Brockton – Approximately 37,357 people (~72%)
- East Bridgewater – Approximately 5,276 (~76%)
- Easton – Approximately 9,008 people (~72%)
- Holbrook – Approximately 4,311 people (~76%)
- Stoughton – Approximately 10,117 (~78%)
- West Bridgewater – Approximately 2,578 people (~77%)
- Whitman – Approximately 6,113 people (~74%)

4.1.1 Market Needs

- Safe, discreet way to purchase their marijuana.
- Strong product, reasonably priced.
- Variety of products.
- New strains and products to be introduced.
- Accessibility to a wide range of marijuana alternatives.

- Knowledge of product their buying

4.1.2 Market Trends

With the legalization of marijuana in states across the country, the market is reflecting that change in a multitude of areas:

- Alcohol sales are declining due to legalization of marijuana
 - A recent article by Tim Kohut published by High Times on January 9, 2018 states alcohol sales have dropped as much as 13% in marijuana legalized states
 - In those state's studies have shown as much as 80% of users in weed-legal states prefer not to mix weed and alcohol
- Cannabinoids used in medicines
 - FDA has approved 3 Cannabinoid-Based medicines
 1. Marinol (dronabinol)
 2. Syndros (liquefied dronabinol)
 3. Cesamet (nabilone)
- Classes are being taught on marijuana in Universities in a variety of area specific fields
 - Various states have multiple colleges/universities with degree's and certificate programs geared towards the marijuana industry
- Science is exploring the use of marijuana
 - Multiple studies have been conducted and many are underway going into the specifics of marijuana and its various uses
- Smaller serving sizes
 - Smaller serving sizes allow for people who aren't regular users get started without feeling overwhelmed by the effects of marijuana and its different uses
- Increased access both domestically and internationally
 - Alaska, California, Colorado, Maine, Massachusetts, Nevada, Oregon, Vermont, Washington, and Washington D.C. have all legalized marijuana to be used recreationally
 - Connecticut, Delaware, Kentucky, Michigan, Missouri, New Jersey, Ohio, Oklahoma, Rhode Island, South Dakota, and Utah are up next to vote in 2018 and many, if not all are expected to vote on legalization
 - Argentina, Australia, Cambodia, Canada, Costa Rica, Czech Republic, Ecuador, Estonia, Germany, Israel, Italy, Jamaica, The Netherlands, North Korea, Mexico, Peru, Portugal, Spain, Switzerland, and Uruguay have all legalized marijuana in some capacity.

4.1.3 Market Growth

The marijuana market is already a multi-billion dollar a year industry. With all the states that have already started selling recreational marijuana, combined with the states ready to get going

in 2018 this year is set to explode – and with the states voting on legalization this year the market is set to expand even further for years to come. Recreational sales have already surpassed medical sales in recent years and a majority of states who voted to allow the sale of recreational marijuana have yet to open stores. No other industry has shown this type of growth since broadband internet, cable tv and transistor radios.

The Explosive Growth of Legal Adult Use and Medical Marijuana Markets

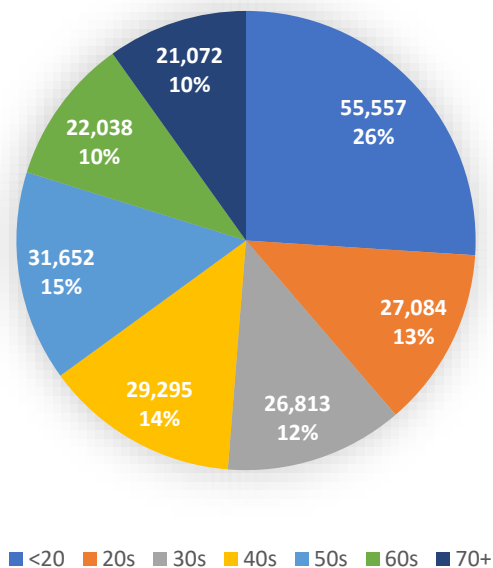


*Source: <https://newfrontierdata.com/tag/marijuana-market/>

4.2 Key Customers

Our target group for customers consists of adults over the age of 21. Seventy-Two (72%) of Brockton's population fit that target demographic. The following chart breaks down our major market's age demographics, illustrating all the different age groups within our chosen location of Brockton.

Brockton, MA Area Population Age Breakdown



4.3 Future Markets

- As current users age, our target market will expand keeping pace with our consumers.
- Once the market takes hold, more people will become aware and educated – turning them into potential customers.
- As more states legalize recreational marijuana, federal laws will change.
- Supply and demand will dictate new regulations and guidelines in the future making the industry run smoother.
- As laws are changing to accommodate the growing market, target customers will grow along with it.

5.0 Roadmap/Future Plans

Over the past few years Natural Agricultural Products, LLC have been conducting painstaking research and due diligence discovering what works and what doesn't. We've traveled to Colorado, California and Washington State talking to mayors, dispensary owners and Commissioners. They've shown us the way and given us the blueprint for success. Here's what we've learned:

- Locate the dispensaries downtown to start.
- Cover about 4 sq. blocks and space out evenly about 500 ft. apart.
- Make sure dispensaries are either below grade or on 2nd floor, only if located downtown.
- Leverage mixed use buildings for maximum revenue (i.e. restaurants, market-rate housing, retail stores, etc.)

- Maximize foot traffic and minimize congestion. (Make people want to walk around and spend their money)

By following these steps, we can build off a proven model and minimize mistakes – in turn maximizing profits. With the proper direction, regulation, collaboration, vision and execution, we can not only follow the model set forth from other marijuana pioneers, but we can take it to levels never seen before.

N.A.P.'s current locations give us a unique position to attack on multiple fronts:

1. The size of Brockton (As mentioned previously) is larger than other cities that have legalized the sale of recreational marijuana to adults, giving us more people within the city to reach.
2. Brockton's unique close proximity to not one, but two state capitols (Boston and Providence) gives our market a lot broader base.
3. The train that can provide not only easy access to Brockton from Boston/Providence, but also people traveling from all across the train line and anyone coming in from the airports held within the hearts of each respective capitol gives us a much larger expanded market than previous "Host Community" participants.
4. Surrounding cities/towns have declined becoming a "Host Community" gives us more potential customers from neighboring cities/towns 360 degrees around Brockton.

As previously mentioned, another strategy the executive management team at N.A.P. have been discussing purchasing all locations that we are currently looking at, then turn around and rent the space we aren't using back to new businesses looking to move in to the area to capitalize on the marijuana industry. We build community by engagement.

6.0 Pro Forma/Financial Statements

The Pro forma and financial statements are estimates and are subject to change depending on a variety of circumstances. Financial data was based off historical data from other states that have already adopted recreational marijuana as an industry.

Assumptions

While preparing this pro forma, there were a number of factors that were taken into account as assumptions and factored in as expenses, income and various balance sheet items. All of our facilities will be using the most state-of-the-art technology, software and equipment. Financials have been made based off historical pricing, salaries, expenses and other factors and are all subject to change due to market conditions, price fluctuations and various other factors.

We plan to have one (1) retail dispensaries, one (1) cultivation & manufacturing center and (1) office in Brockton, all will be built out with energy efficiency, economics and ease of maintenance in the forefront. All income data has been analyzed based off information derived from various credible websites that have extracted data directly from states in which recreational marijuana is currently an industry.

Our cultivation center will include a grow operation that at its peak will cover the maximum 100,000 sq. ft. of canopy as allowed by the Commonwealth of Massachusetts and a manufacturing/processing center that will extract, prepare, manufacture and pack various edibles, extractions, oils, tinctures, salves, vapes, and other MIPs.

Our dispensaries will range in size, but will not exceed the max. size for a dispensary which is 5,000 sq. ft. Each dispensary will have between 15-20 cash registers open at a given time with enough staff to work the cash registers and assist patrons. We will be open the maximum time as allowed by the municipality and will be open every day.

The costs for all expenses, supplies, equipment, hardware, software, buildout, salaries, and any other investment and/cost associated with the preparation of this pro forma and financial statements have been derived from current and historical data analyzed from various cities and states around the country and are all subject to change at any given time based off market conditions and other factors.

	2019	2020	2021
Total N.A.P. Revenue	\$30,100.000.00	\$45,150.000.00	\$54,000.000.00

Expenses	2019	2020	2021
Salaries	\$1,607.480	\$2,404.708	\$3,281.658
Employee Benefits	\$1,283,159	\$1,420,426	\$1,587,115
Insurance	\$116,651	\$129,130	\$144,283
Transportation	\$275,000	\$550,000	\$550.000
Office Supplies	\$15,000	\$22,500	\$30,000
Phone/Internet	\$10,000	\$12,500	\$15,000
Packaging	\$250,000	\$425,000	\$675,000
Nutrients & Soil	\$150,000	\$450,000	\$1,500,000
Legal/Accounting	\$45,000	\$75,000	\$110,000
Kitchen Supplies	\$125,000	\$175,000	275,000
Edible Supplies	\$30,000	\$55,000	\$80,000
Equipment	\$1,500,000	\$500,000	\$500,000
Licenses	\$29,700	\$30,400	\$32,900
Security/Monitoring	\$15,000	\$25,000	\$50,000
Rent	\$372.000	\$470.000	\$600,000
Utilities	\$350,000	\$600,000	\$950,000
Total Expenses	\$6,401.990	\$7,343.664	\$8,160.956

	2019	2020	2021
Pretax Income	\$6,622.000	\$9,933.000	\$11.880.000

STARTUP OPERATIONS COSTS

Total Deposits	\$150,000	Three months rent
Plants/Seeds	\$50,000	Estimated seed cost
Plumbing and Irrigation Piping	\$100,000	Estimated cost of PVC piping, valves and installation
Security	\$25,000	Estimated cost of cameras, hard drive storage, cabling & installation
Licensing	\$29,700	MA cost of licenses and fees
POS Systems	\$75,000	Estimated cost for 30 POS machines
Utility Deposits	\$87,500	Three months utility deposits
Leasehold Expenses	\$750,000	Estimated cost of build-out for the cultivation center and dispensaries and one (1) office space
Office Supplies	\$15,000	Estimated cost of paper, ink, printing, etc.
Architect Fees	\$50,000	Estimated cost for design of one (1) cultivation center and three (3) dispensaries
CO2 Systems	\$7,500	Estimated cost to purchase and install propane driven CO2 generator to speed plant growth
Vehicles	\$70,000	Estimated cost to purchase and alter two (2) company vehicles for delivery and other company needs
HVAC Buildout	\$160,000	Estimated cost of build out for HVAC and air filtration system
Kitchen/Food Prep Equipment	\$75,000	Estimated cost of buildout of commercial kitchen for the making of edibles
Water Filtration System	\$25,000	Estimated cost of purchase and installation for a water filtration system to remove any harmful elements
Furniture	\$75,000	Estimated cost company furniture and country build out for display in dispensaries
Safe and Storage Systems	\$225,000	Estimated cost of purchase and installation of multiple safes in both the cultivation center and dispensaries

7.0 Team Members – Organizational Structure

TEAM MEMBERS

President

Roles – Develops the vision of the company, creates and implements policies, manages strategic development and monitors the company's financials and production.

Responsibilities – Responsible for the overall performance of the company as a whole. (S)He monitors financials and insures resources are used efficiently, and is also responsible for signing all contracts on behalf of the company. The president is responsible for everything from strategic development and performance management to public relations and hiring high level staff. All fiscal responsibility as well as the company's bottom line accountability is attributed to the president.

Relationships – The president is a member of the executive management team and is at the top of the organizational hierarchy and reports to the board of directors. The president is responsible for ensuring the hierarchy runs smoothly all the way down the chain of command.

Executive Director

Roles – The executive director has all department heads reporting to him/her with any/all issues and insures all departments perform as expected. (S)He manages every position down the organizational chart and works closely with all department heads below him/her to ensure employees are working collectively towards the betterment of the company. The executive director works with direction from the president and helps to build all policies and procedures, analyze/assess financials and help build a more developed and defined work force.

Responsibilities – The executive director manages all day-to-day operations throughout the entire company and is often the interface between the company, its customers and vendors. (S)he looks for any issues within the organization and strategically utilizes employees to address specific problems that (s)he finds. Ultimately, the executive director controls all day-to-day operational, managerial, financial and product-related functions within the company.

Relationships – The executive director is a member of the executive management team. (S)he has all department heads reporting directly to him/her, as well as some who are independent of other relationships such as the bookkeeper, comptroller, marketing and security. The entire company responds to the orders of the executive director. (S)he utilizes all department heads to insure constant compliance within all operating procedures and looks for areas to be improved.

Managing Agent

Roles – The managing agent has all dispensary and grow operation managers reporting to them and ensures everything runs smoothly. (S)he directly works with all facility managers on the daily operations of the dispensaries and grow facilities and reports directly to the executive director.

Responsibilities – The managing agent is responsible for the management of all dispensaries and grow facilities. (S)he works as the liaison between all of the dispensary and facility managers and looks for any areas that can be approved upon.

Relationships – The managing agent(s) are member(s) of the executive management team. They report to the executive director and have all facility manager's report to them.

Cultivation Center Manager

Roles – The cultivation center manager has all cultivation, edibles and delivery managers reporting to them and reports directly to the managing agent. (S)he works directly with department managers to ensure grow facility as a whole is within compliance at all times and operates to its fullest capabilities.

Responsibilities – The cultivation center manager is responsible for ensuring all department managers are operating smoothly and all day-to-day responsibilities are being performed. (S)he must also regularly look for any/all problems, issues and/or inefficiencies within the cultivation center.

Relationships – The cultivation center manager has all grow department managers reporting to them and reports directly to the managing agent.

Dispensary Manager

Roles – The dispensary manager has the overall operation of the individual dispensary under his/her control. (S)he is in charge of logging inventory as it arrives, ensuring the dispensary is fully stocked at all times, accounting for all cash at the end of the day and settling up for any/all shipments in/out of the dispensary. The dispensary manager manages all dispensary employees to ensure production, expectations and most of all quality customer service and compliance is maintained within the dispensary at all times. The dispensary manager works closely with the marketing team to identify specific requests from customers that will result in overall growth for the company.

Responsibilities – The dispensary manager is responsible for opening/closing the dispensary daily, beginning/ending inventory, daily manifests, maintenance, scheduling and compliance. The dispensary manager is also responsible for working with security to ensure the safety of all customers, employees, inventory and money as well as ensuring the dispensary remains compliant at all times. The dispensary manager is ultimately responsible for all activities within the dispensary, including overall customer service and monitoring customer feedback to ensure satisfaction and loyalty.

Relationships – The dispensary manager reports directly to the managing agent and has all budtenders reporting to them. (S)he works with security and coordinates with other department managers when needed.

Cultivation Manager

Roles – The cultivation manager has the overall operational say over the cultivation of plants. (S)he ensures plants are tended to, nutrients are fed, water is stabilized, lights are checked, soil

levels/temperatures/humidity is where it needs to be, soil is tested, finished product is tested and mechanical infrastructure is maintained. It is up to the Cultivation manager to make sure all nutrients, soils, containers, and any other cultivation related supplies are properly stored, maintained and ordered as necessary to ensure nothing is ever out of stock when needed.

Responsibilities – The cultivation manager is responsible for all marijuana with the cultivation operation from seed to sale. It is the cultivation manager’s responsibility to ensure all inventory in all life cycles are accounted for, finished product is packaged and sent to correct locations and is safe for all customers to consume. (S)he is also responsible for ensuring the cultivation operations cleanliness, production, maintenance, efficient and compliant at all times.

Relationships – The cultivation manager reports to the cultivation center manager and ensures everything runs smoothly within the cultivation among all employees.

Edibles Manager

Roles – The edibles manager is in charge of producing marijuana infused products (MIPs) within a commercial kitchen setting at the cultivation facility. They must ensure safe cooking and preparation practices and account for inventory used in the production of each individual MIP. The edibles manager will produce recipes, formulas and operating procedures for each part of the edibles manufacturing process. The edibles manager will solicit input from dispensary managers, marketing and the executive director to continually produce new, unique, and exciting products to increase revenue within the company.

Responsibilities – The edibles manager is responsible for ensuring only safely prepared and packaged products are available to customers and will work with contracted quality assurance and laboratory consultants to ensure all products are produced in a hygienic manner and will have samples tested for mold, bacteria, heavy metals, pesticides and THC. They will observe all labeling laws and provide nutrition information on all products. The edible manager oversees packaging/labeling contractors, insures health and safety, as well as compliance at all times.

Relationships – The edibles manager reports to the cultivation center manager and has all kitchen staff report to them. They will also provide reports to the bookkeeper to ensure all inventory is accounted for as well as work with compliance officials to ensure both the MIPs and the labels are in compliance and commercially acceptable.

Delivery Manager

Roles – The delivery manager is in charge of ensuring safe and accurate deliveries of all marijuana from the cultivation facility. The delivery manager controls driver’s manifests, insures proper product is recorded before it leaves and accounts for receipts from the delivery driver’s return manifest. (S)he insures vehicles are safe, maintained and in good working condition at all times, that all GPS monitors are working properly as well as all communications devices are checked daily. The delivery manager will maintain constant GPS status on all driver’s locations. (S)he is trained to handle specific emergencies including holdups, driver car accidents, product recall, etc. Along with driver coordination, the delivery manager also works with security to ensure a safe atmosphere for employees before, during and after all deliveries arrive/leave the cultivation facility.

Responsibilities – The delivery manager is responsible for ensuring that the product is received from the cultivation facility, matches inventory orders, logs inventory to be delivered into delivery manifests, adjusts moved inventory in the inventory management system, balances cash and product at the end of the day, and ensures drivers provide safe and timely service while maintaining strict security measures and ensuring compliance at all times. The delivery manager is also responsible for the safety, care and wellbeing of all drivers.

Relationships – The delivery manager has the drivers as their employees and reports directly to the cultivation center manager.

Master Grower

Roles – The master grower is directly in charge of the plants within the cultivation facility. (S)he works under the cultivation manager to ensure all processes and procedures are followed and all plants in the various cycles are healthy. The master grower is in charge of managing cycles, individual strains, potency, efficiency and health. The master grower will work directly with growers, trimmers and the harvesting staff to teach them all proper techniques, processes and procedures and to ensure the operation runs smoothly. The master grower will also explore unique strains of his/her own and at all times maintain specific plants that will be entered into various Cannabis Cups.

Responsibilities – The master grower is responsible for the health, safety, cleanliness and inventory of all plants within the cultivation facility. It is the master grower's responsibility to ensure pH levels of water are correct, proper doses of nutrients are being applied, soil/temperature/humidity levels are in order, equipment is functioning properly and all growers, trimmers and harvesting staff are performing in an effective manner and following all techniques, processes and procedures shown to them to ensure consistent feeding, manicuring and harvesting is shown to all plants in all cycles in order to maximize yields.

Relationships – The master grower works directly under the cultivation manager and reports to the cultivation manager, cultivation center manager, managing agent and executive director and has all growers, trimmers and harvesting staff reporting directly to them.

Growers

Roles – Growers will work alongside the grow master in tending to the marijuana plants throughout their various life cycles. Growers will learn from the grow master about various growing styles, nutrient tables, different light spectrums, and all other areas of marijuana cultivation and implement what they learn in their daily activities.

Responsibilities – Growers are responsible for tending to plants daily by watering, monitoring, replacing soil levels and rotating plants throughout different rooms to account for various life cycles. Growers are also responsible for maintaining cleanliness of all rooms and cultivation areas at all times.

Relationships – Growers report directly to the grow master and cultivation manager.

Trimmers

Roles – Trimmers are cultivation employees trained to cut, shape and maximize plant growth by removing excess leaves outside of the light canopy that are non-productive elements and are unnecessary to the plant's growth. They trim excess leaves and stalks and then inventory them to make sure all parts of the plant are accounted for.

Responsibilities – Trimmers are responsible for removing all non-productive leaves, any sort of growth that appears in the potted soil, and shaping the plants to maximize efficiency in nutrient uptake and light absorption. They are also responsible for coordinating the packaging and utilization of excess trimmings, whether used for production of edibles or destroyed.

Relationships – Trimmers coordinate with the harvesting staff as to the plant's readiness for trimming, cutting and placement into drying/curing areas within the cultivation facility and report directly to the head grower and cultivation manager.

Harvesting Staff

Roles – The harvesting staff are trained employees who move the plants into a harvest room for harvesting buds off of matured plants. They are also responsible for the physical inventory by matching each plant's RFID tag or any other identifying mark to an inventory sheet produced by seed to sale software. The harvesting staff also ensure harvested product is labeled for the drying/curing rooms and that all plant material is weighed and entered into the tracking database.

Responsibilities – The harvesting staff is responsible for the removal of the buds from the female plant, insuring the trichomes aren't damaged and batch different strains together on specific drying racks.

Relationships – The harvesting staff reports directly to the head grower and cultivation manager, who is present for every harvest. In the event the cultivation manager is not there, either a managing agent and/or the executive director will be present to ensure proper count and weighing of final product. Security will also work with the harvesting staff in order to ensure all product is recorded, documented and safely transported to drying/curing rooms as well as all final locations.

Kitchen Employees

Roles – Kitchen employees are responsible for the day-to-day preparations of all marijuana infused products through hygienic means, adhering to recipes and formulas prepared by the edible's manager. They cook, package, label and inventory all MIPs as well as ensure the kitchen is properly cleaned at the end of every day in order to avoid any sort of bacteria entering the cooking process.

Responsibilities – Kitchen employees are responsible for both storing and inventorying ingredients within the kitchen as well as preparing the necessary MIPs for sale. It is the kitchen employee's responsibility to ensure the kitchen is kept clean and free of anything that could end up in the edibles.

Relationships – Kitchen employees report to the edibles manager and will occasionally interface with vendors when specific products are received.

Packaging/Labeling Employees

Roles – Packaging/labeling employees part-time employees brought in to measure, weigh, portion and vacuum pack all finished product. Their job is to weigh all edibles and flower into predetermined amounts and run it through a vacuum sealer or other packaging machine to close the product in ensuring no air or contaminants leak in, maximizing freshness and safety. They also produce a label for each finished product showing batch, weight, type of product, strain, expiration date, and any other wording and/or marking required by regulations. They work with the cultivation center manager to ensure all flower and edibles labeling/packaging is within all government requirements and compliant at all times.

Responsibilities – Packaging/labeling employees are responsible for weighing, measuring, proportioning, packaging and labeling all matured flower and finished edibles ready to go out for wholesale or sale within our dispensaries. They are also responsible for ensuring proper inventory is input into the seed to sale tracking software. They attach final tags to the product and not if there are any discrepancies in weight. They are responsible for ensuring all packaged marijuana and marijuana and MIPs are traceable back to a particular grow and from what seeds/clones they were grown. They are responsible for informing management of any necessary ancillary product ordering.

Relationships – Packaging/labeling employees report directly to the cultivation and edibles managers depending on what they are brought in for. They also work alongside the cultivation center manager during weighs/labeling to ensure compliance.

Drivers

Roles – Drivers are the company's delivery people. They transport marijuana from the cultivation facility to other dispensaries across the state. They operate in pairs, in vehicles equipped with GPS and 2 separate forms of communication. The vehicle will not be marked with any identifying markers making it obviously a marijuana delivery vehicle. Drivers will ensure the correct product is delivered to the correct location in a timely manner.

Responsibilities – Drivers are responsible for following the manifest given to them when on delivery, the safe keeping of all inventory in locked safes within the vehicle, for bagging cash as received and providing manifests of cash collected. They are also responsible for reporting and failed or unaccepted deliveries.

Relationships – Drivers report directly to the delivery manager and managing agents. They will interface with the cultivation center manager, cultivation manager or edibles manager when obtaining product for deliveries and will occasionally interface with the bookkeeper when dropping off cash, receipts and daily manifests.

Budtenders

Roles – Budtenders are the company’s interface with the public. They offer advice, knowledge and provide direction on strains, edibles, products or other inventory from the dispensary which will suit the customer’s needs. They handle all cash and POS transactions and ensure all sales are accounted for. When educational material is requested, they will guide the patron to the location and answer any/all questions they may have.

Responsibilities – Budtenders are responsible for insuring all transactions are put through POS machines and are accounted for. They also check manifests and delivery reports to ensure all product is accounted for.

Relationships – Budtenders report directly to the dispensary manager.

Security

Roles – Security is responsible for ensuring the employees, patrons, and facilities themselves are secured and safe at all times. They will patrol grounds, as well as observe through cameras and interface with management to document any weaknesses found.

Responsibilities – Security is responsible for insuring all inventory is where it needs to be and isn’t removed from the premises without proper documentation. They are also responsible for watching all employees throughout the day to avoid any possible theft, robbery, collusion, or any other possible infraction. Security will interface with management, as well as any hired experts, to facilitate any changes, testing or documentation of safety procedures.

Relationships – Security reports to the facility managers as well as the Executive Management team.

Bookkeeper

Roles – The bookkeeper is in charge of the company’s financials. They ensure bills are paid, reports are made, cash is accounted for and payroll. (S)he will monitor transactions and properly record them in the correct computer system.

Responsibilities – The bookkeeper is responsible for verifying all cash and bank deposits/receipts, preparing monthly journal entries and all financial statements as required or requested, and keeper of all manifests of inventory for product, coming and out of company.

Relationships – The bookkeeper reports directly to the president and the executive director.

Comptroller

Roles – The comptroller provides a layer of checks and balances to the bookkeeper, harvesting staff, and cultivation center manager to ensure all weighs, cash and product are accounted for, and that all reports are accurate, on time and within regulations. (S)he will serve as the company human resource agent, handling all company benefits. (S) he will randomly spot check all parts of the company to ensure there is no collusion and to ensure all safeguards and reporting mechanisms are functioning properly and as intended.

Responsibilities – The comptroller is responsible for checking all inventory, cash deposits, receipts, reports, accounts payable/receivable, and ensuring an effective, efficient and solid audit trail is available for compliance officials or any other professional engaged, contracted or any way other affiliated with the company. Will monitor changes in company benefits, making sure N.A.P. is competitive in its offering to the employee's, and beneficial to the company.

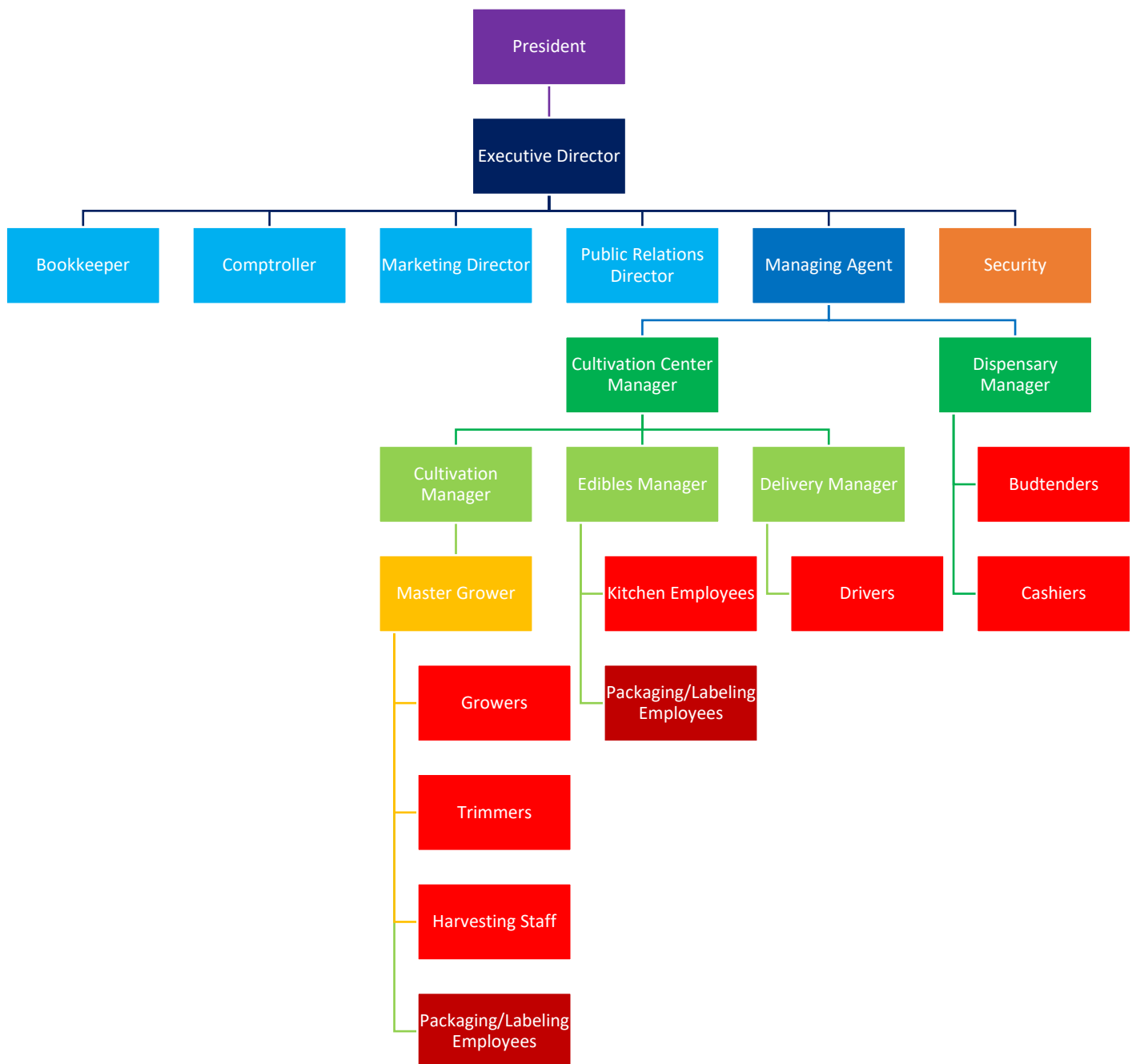
Relationships – The comptroller reports directly to the executive director, and responds to outside compliance, accounting and legal teams. (S)he has only one boss - the executive director. To ensure neutrality and transparency, the comptroller may bypass the executive director and report directly to the board of directors with any suspicious or uncorrected issues.

Marketing

Roles – Marketing will work on achieving the greatest market share possible by constantly striving to increase our awareness within the industry and target market. They will use traditional media as well as social media and other means to attract new customers, product and exposure as well as working to retain what we already have.

Responsibilities – Marketing is responsible for creating/monitoring all social media accounts updating for pricing changes as well as inventory, hours of operation, or any other changes to the company that customers need to know. They will be in charge of the website and must ensure it's up to date with new blogs posts and other timely information posted daily. They will develop analytics to show conversion form viewers and followers of both our website as well as social media profiles.

Relationships – Marketing reports directly to the president and executive director of the company.



8.0 Physical Structure of the Dispensaries/Cultivation Center

All our facilities (Dispensaries and cultivation center) will have their entire physical structures designed around economy, easy consumer access and compliance within all regulations, zoning and ordinances. A number of components will be considered. All blueprints will be put through computer software programming in order for us to design and review it multiple times and add any input along the way before committing to construction. Natural Agricultural Products, LLC, its executive management staff and officers are dedicated to not only complying with all regulatory, permitting and construction requirements, but reaching beyond them and exceeding all expectations. It is our goal to design the most state-of-the-art, consumer friendly, secure and well-regulated cannabis facilities in the industry. We will strive to be the benchmark for all companies moving forward.

Some of the major components within our facilities will include:

1. Efficient, high wattage electrical system with renewable energy in the forefront
2. Effective and efficient water supply and pipe infrastructure
3. Proper ventilation with easy cleaning and maintenance access in mind
4. National Fire Protection Association (NFPA) insured fire prevention
5. State-of-the-art security provisions exceeding regulatory requirements
6. Cleanroom like growing environments
7. Luxury-style showcase rooms and display cases
8. Easy access in/out with secured entry for all patrons

9.0 Projected Growing Guide

Cultivating marijuana includes multiple stages of life with a full cycle being roughly 4 months. Cannabis plants will go from seedlings to the vegetation (veg) state, then will start their flowering cycle before beginning their budding stage and finally it will be harvest time – which involves drying and curing the matured marijuana.

Mother plants play a very crucial role in indoor cultivation and can save the cultivation team a lot of valuable time. The 1st stage of a cannabis plant's life (Seedlings) can sometimes take a while before the plant reaches sexual maturity (Male/Female), because of that it is much more efficient to clone a plant that is already a matured female which will be able to begin flowering once roots have taken hold. This is possible because the mother plants will pass along their DNA to the clones, including age. By keeping the clones in the proper light cycle (18+ hours a day) they are able to stay in the vegetative state for extended time periods.

Once clones have been established within their veg state, they are able to begin flowering immediately, but should ultimately be grown out in order to increase root mass and begin advanced life stages. Root growth is at its strongest during the veg state, so it is best to ensure maximum growth in the clones before moving on.

The flowering phase is started by transitioning the plant's light exposure from the 18+ hours per day they're used to in the veg state to 12 hours on/12 hours off. That gives the plant the illusion of it being "fall" and they need to produce before winter comes. At this point the plant will begin to extend out and try to catch pollen (which it won't find within the cultivation center).

When that happens, it's called Sensimillia, which is a term given to unpollinated marijuana – which is a grower's ultimate goal.

Harvest time is the last stage and is as important, if not more important than the other stages. This is where you will cut the stalks of the matured buds from the plant itself and begin drying/curing the matured flower so it will become consumable through inhalation, extraction and any other means. Harvesting matured flower at the right time is key; if you harvest too early before the trichomes can become fully developed, the plant loses its potency – on the same hand if you wait too long, the plant will also lose its potency. It is key to ensure harvest is done at the right time to ensure maximum potency.

As previously stated, drying/curing is the final phase before the marijuana is able to be consumed. Once you cut the stalks of the plant, the stalks will then be hung to dry in an air-tight, enclosed area. After roughly 5-7 days, the stalks can be removed and then manicured some more to cut away any excess leaves and ensure only the bud remains. This ends the drying phase and all that's left is curing. That happens when the dried buds are placed into different air-tight containers, allowing the remaining moisture to be distributed evenly throughout and not just on the exterior of the bud. This process usually takes between 4-8 weeks and once complete, the flower is ready for sale.

10.0 Product Offerings/Services

We will offer 8-12 unique strains of marijuana. Each strain will have a separate THC content. We will have varieties of all types of marijuana, Sativa, Indica and Hybrids. In addition to unique strains of flower, we'll also have extractions, tinctures, edibles, pens, drinks and other various marijuana infused products (MIPs). Beyond flower, edibles and MIPs, N.A.P. will also have available for purchase various marijuana related accessories (Bongs, bowls, dab rigs, pens, vapes, etc.)

One way we look to separate ourselves is to also offer educational services to our patrons and the public as a whole who may not be active patrons currently. The educational services will range from home growing classes (Where we will sell tents and starter kits after the class to individuals interested in cultivating their own marijuana at home) and informative classes on marijuana as a whole, to local marijuana laws and setting up yourself for employment within the cannabis industry, as well as many others in-between.

At N.A.P. we are always striving for innovation and looking to set ourselves apart from other companies within the cannabis industry.

11.0 Marketing Plan

The marketing materials for Natural Agricultural Products, LLC (NAP) will consist of:

- Brochure/menu
- Business referral program
- Company website (www.napbrockton.com)
- Facebook page (@NAP Brockton)
- LinkedIn account

- Twitter/Instagram/Snapchat (@napbrockton)
- Creating branded products and market to other dispensaries
- Ads in industry magazines
- Email blast to existing customers and other in target demographic
- Customer appreciation program
- Frequent buyer offers

Web Plan

Our website will have a dual goal: 1) to encourage visitors to sign up for our e-newsletter and 2) visit our dispensaries in person. The website will have a menu with vivid images and descriptions of each strain, edible, MIP, and any other product we offer easily accessible. On the main page of the website we'll include:

- Menu (Including any/all specials, all strains, edibles, etc.)
- Location of the dispensaries with driving/public transportation routes
- Hours of operation
- Contact information (Including links to follow us on all our social media platforms)
- Form for questions, comments or concerns
- Jobs page with all open positions available
- Archived news articles pertaining to marijuana and the marijuana industry
- A blog updated daily

Our growing content will increase our visibility for related keywords. People who look at archived articles will be encouraged to sign up for our monthly newsletter – which will include tips, special offers, introduction to new products and any other valuable information for our customers. It's NAP's goal to have our existing customers and prospective patrons receive enough promotion and education to understand and appreciate how serious and well-run our operation is. It's our goal to become the premier recreational marijuana company in the Commonwealth.

Company Awareness

NAP will focus on all industry events nationwide, as well as various major market media that includes industry events, magazines, forums, trade shows, conferences, etc. We will work locally to help improve the lives of various groups, organizations and individuals. Our goal is to create a recognizable brand across the country and have all other cannabis companies look to us for guidance.

Price

Our pricing will be between \$10.00 - \$12.00 per gram retail, which is the industry average. Our mindset is to continue to be in the median-slightly-above-median price range of both smokable and edible marijuana products. Industry averages are around \$8.00-\$12.00 (and slightly higher)

for retail marijuana, depending on strain and potency. We will constantly monitor competitors to ensure we remain competitive.

Customer Retention

Employees of NAP will pride themselves on their customer service and company perception. It is our goal to create a relaxed atmosphere and an at-home type of environment where the employees know you and the customers feel comfortable. We will also be offering various classes, seminars and other educational-type events for adults 21 years and older in order to both increase the company's exposure and respect as well as separate us from the competition.

12.0 Inventory Control

The Commonwealth of Massachusetts has mandated all marijuana facilities be equipped with "seed to sale tracking" systems in order to keep track of all inventory grown, stored and sold within the industry and ensure no diversion, theft or any other means takes place. This state-wide mandate had been made easier by software companies who have developed technology to make the process simple and seamless.

We will be using this software to keep track of all inventory records within the company. Each individual plant will be tagged and tracked from its entire grow cycle (seed, veg, bud, flower and harvest) through sale. Each transaction will be properly documented, tracked and then subsequently stored in our records for future reference.

In addition to "seed to sale tracking" software, N.A.P. will also implement a number of other incident reporting forms, documentation software and other programs that will interface with each other in order to better track, record, document and store all our inventory and records for inventory. We will ensure all transactions are trackable, transparent and honest.

13.0 Compliance Checklists

The Massachusetts Cannabis Control Commission has set forth a number of guidelines and regulations that need to be abided by at all times. We have looked at those regulations along with our legal team and together have comprised a list of compliance checklists and company guidelines to ensure all of our employees are trained and managed to be compliant with all guidelines at all times. We have combed through 935 CMR 500.000 and used the legal wording in that document to create our checklists to ensure maximum effectiveness.

In order for us to maintain order, compliance and efficiency, all workflow and daily activities must be properly documented in order to ensure we are within all mandated regulations. For example, if it is mandated that at all times of harvest there must be a member of the executive staff present, on our checklist for our harvest there will be a spot for that particular manager to both sign in/out as well as initial next to final amounts with dates and times present for all weighing.

14.0 Security Plan

Natural Agricultural Products, LLC will work to establish adhere to a strict security protocol which will conform to, if not exceed all mandated regulations and guidelines. If needed, in addition to our established security measures we will provide additional security if voiced by the public, municipality, state or any other governing body.

Due to federal law, we are currently prohibited from having armed security inside our facilities. However, we will have outside security companies present for all busy periods as well as anytime a cash shipment is being processed for delivery at any of our facilities.

We will have all drivers equipped with GPS tracking devices as well as two (2) forms of separate communications. All facilities will be built out with the most state-of-the-art security cameras, motion sensors, alarms, key cards, window breaking systems, cash registers, safes, and all other equipment and security devices installed within our company.

In addition to every individual measure taken for security measures through technological means, we will also train each employee personal member in specific emergency action responses, employee accident reporting, investigation policies, fire prevention, potential hazardous material storage, and any possible security issue that may arise.

15.0 Appendix

- Boulder, CO recreational marijuana information found at: thecannabist.co/2017/12/12/colorado-marijuana-sales-data-calculation/94514/
- Marijuana specific info found at mjbizdaily.com
- Demographics info for Abington and Holbrook found at: suburbanstats.org
- Demographics info for Avon, Brockton, East Bridgewater, Easton, Stoughton, West Bridgewater and Whitman found at: towncharts.com
- Demographics info for Bridgewater found at: neighborhoodscout.com
- Average marijuana consumer info found at: cannabisconsumer.org
- Marijuana market growth rate information found at: <https://www.statista.com/statistics/794471/us-legal-use-cannabis-market-growth-state/>
- Financial information found from various sources and later analyzed, compounded and input by maker of business plan
- Recreational Marijuana effect info found at: <https://news.lift.co/five-years-effects-legalization-colorado-washington-state/>

EXECUTIVE SUMMARY

2.0 Cannabis is a new and exciting Industry introduced to Massachusetts by the will of the voting population in 2016. Natural Agricultural Product's business plan has been created to lay out pertinent information gathered from states that have approved the recreational sale of cannabis for a number of years. This business plan will cover our mission, site analysis, trends, demographics, finance, employment, inventory, and marketing strategies. All informational statistics obtained are listed in the appendix on the last page of this report.

Site analysis is based off a 5,000 sq. ft. retail dispensary location, a tier 2 cultivation facility up to 10,000 sq. ft., and 3,000 sq. ft. office space, our future is to open 2 more retail dispensaries, and increase cultivation to 80,000 sq. ft of canopy in the same cultivation facility. The timeline goal for all to be at full capacity is year 2020.

Demographic information was obtained from government-reported census websites (census.us and neighborhoodscout.com) compiled into charts as to be easily read, and compared. Marketing information explains strategies, and avenues to explore to identify and target our cliental, and demonstrates the needs to retain our customer base. Various websites such as cannabisbusinesstimes.com, forbes.com, mjbizdaily.com, and cannabisconsumer.org were used to analyze the business plan information. The marketing tools suggested were blogs, face book, linked in, twitter, Instagram, snapshot, and other social media sites, which we will use toward marketing to individuals 21 years and older.

Financial information is based off national averages and has been kept to a very conservative level. Information provided by times.com and mjbizdaily.com, marijuana shops have a national average profit of \$974/ per sq. ft. and our finances have been based off \$850 per sq. ft. Our plan is having 5,000 sq. ft. retail, at the conservative rate of \$850 per sq. ft., each dispensary would generate 4.25 million per location. Cultivation according to newfrontierdata.com the average harvest is \$1,120,100 per acre which breaks down to \$257,623.00 for 10,000 sq. ft. harvesting 3-4 times at average per year, adding \$1,000.000 plus for each 10,000 sq. ft. of canopy. Natural Agricultural Products has the capacity to expand their facility up to 80,000 sq. ft., and plan to be at full capacity within 2 years of operation.

Natural Agricultural Products has researched, and contacted qualified, experienced personal that have the ability to train employee's the rules and regulations provided by the Cannabis Control Commission of Massachusetts. N.A.P. will require that all employees attend seminars pertaining to the 935 CMR 500.00: Adult use of marijuana provided by the Commonwealth of Massachusetts at the company expense. N.A.P. will also conduct continuing educational classes, keeping staff up to date on changes to the regulations, and requirements that the CCC could alter or add in the future as the Industry progresses.

The business plan will cover market needs, trends, and growth, with a strategy to accomplish these goals. Pro-forma, and financial statements are subject to change

depending on a variety of circumstances such as growth, expansion, and acquisitions. Our focus is to open one (1) retail dispensary, and one (1) cultivation facility in the city of Brockton in 2019, the City of Brockton limits one license to all applicants for any and all tiers of licensing. N.A.P. has the research, and development team working on retail locations in Fall River, and New Bedford Ma. that has similar demographics and population as Brockton.

Natural Agricultural Products will progress to extractions of cannabis for vape pens, tinctures, ointments, chocolates, candies, etc. These are other revenue streams that N.A.P. will develop within the first year of opening. N.A.P. has had conversations with entrepreneurs that market smoke shops that would accommodate the retail cannabis Industry, and increase foot traffic which will attract more businesses to our locations. N.A.P. has chosen the City of Brockton to use as our model for the opening our first retail shop, and cultivation facility. The model that N.A.P. will use comes from Boulder Co., whereas the population and household medium are close to the same. The difference that you will see in the business plan is the potential to capitalize on the market that abuts the city of Brockton that is 3 times larger than Boulder Colorado. Brockton is considered the hub of the South Shore, also referred to as the gateway to the Cape, and survey's show that most of the residents that live in towns near by originated from Brockton. These are few of the reasons why Brockton was selected to be home to our company.

The N.A.P. plan within 5 years of operation, year (1) have 1 dispensary running at full capacity, with all revenue steam Flower, edibles, tinctures, and oils, smoke shop, glass blowing shop, and once approved a diner or bakery with Marijuana Infused products. After first year we will be looking to open two more dispensaries in different communities, such as Fall River and New Bedford Ma., we have made contact with town officials there, and would be happy to negotiate a host agreement with them at a timeline suitable for all parties, this would be year two. The start of year three N.A.P. will acquisition all properties that are dispensaries and cultivation centers and rehab the buildings to framework or theme of the neighborhood, in a environmentally friendly manner. The company will covert to clean energy, with the installation of solar and wind power, setting an example to others, and assisting other companies on the process of going green. The company's future in the 5th year will be to get factories up and running again in Brockton to manufacture Hemp products, hemp is now used to manufacture rope, but in the 1930s clothing was made of hemp, and the material would last for 30 years, but after the 2nd world war it became illegal to use hemp, because no one was buying cotton products, the special interest won that battle, but now hemp is back in the market, and is estimated to be a trillion dollar Industry. N.A.P. plans to manufacture products such as belts, hats, pocketbooks, wallets, and most of all shoes. Brocktons history boasted being the shoe capital of the world, and N.A.P. would love to repeat history.

Martin D. Conboy, CPCU, ARM
Lynch and Conboy Insurance Agency Inc.
31 Plain Street, PO Box 3489
Brockton, MA 02304
508-941-5711
marty@lynchconboy.com

November 13, 2019

The Cannabis Control Commission
101 Federal Street
13th Floor
Boston, MA 02110

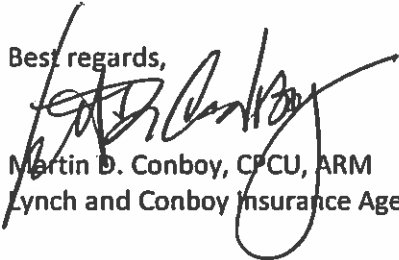
Re: Natural Agricultural Products, LLC

Dear Commissioners:

Mr. Gary Leonard, Manager of Natural Agricultural Products LLC has been APPROVED for general liability insurance including products liability in the amount of \$1 million per occurrence and \$2 million aggregate. The deductible is \$2,500.

Do not hesitate to call me directly if you have any questions or concerns.

Best regards,



Martin D. Conboy, CPCU, ARM
Lynch and Conboy Insurance Agency Inc.



Insurance quote presented to:

N.I.F. Group, Inc. - Manhasset, NY

Julie Sonier

For

Natural Agricultural Products LLC

Proposed policy period

12 Month(s) - Effective Date TBD

BY

Rick Nunnally, Underwriter - Products Liability

(804)289-1351 - rick.nunnally@kinsaleins.com

11/12/2019

NO FLAT CANCELLATIONS ONCE COVERAGE IS BOUND

**Kinsale Insurance Company P.O. Box 17008 Richmond, VA 23226
Phone (804) 289-1300 Fax (804) 673-5697
www.kinsaleins.com**

Kinsale Insurance Company

A.M. Best Company Rating: A- (Excellent)

Financial Size Category: IX

N.I.F. Group, Inc. - Manhasset, NY - Julie Sonier

QUOTE

RE: Natural Agricultural Products LLC
4 Main Street
Brockton, MA 02301

Submission #: 01762882
Quote Letter #: 05673131
Quote Date: 11/12/2019

Company: Kinsale Insurance Company

Policy Term: 12 Month(s) - Effective Date
TBD

Coverage Form: Commercial General Liability - Claims Made

Retro Date: Inception

Description of Operations: Cannabis Cultivation

We are pleased to offer the following quote. This quote is valid until 12/12/2019 unless extended and agreed to in writing by us. Please read carefully as the terms and conditions of coverage may differ from those requested. **THIS IS NOT A BINDER OF INSURANCE**

Limits	
Each Occurrence Limit	\$1,000,000
Damages to Premises Rented to You Limit	\$100,000
Medical Expense Limit	\$1,000
Personal & Advertising Injury Limit	\$1,000,000
General Aggregate Limit	\$2,000,000
Products / Completed Operations Aggregate Limit	\$2,000,000

Deductibles	
Per Claim	\$2,500
** Deductibles apply to all coverages, damages, and expenses.	

Coverage Enhancements	
Primary / Non-Contributory Endorsement	

Basis of Premium

<u>Class Description</u>	<u>Exposure Base</u>	<u>Exposure Units</u>	<u>Rate</u>
Marijuana Products - Growing, Processing and Cultivating	per \$1,000 Gross Sales	850,000	4.6059

Premium (Minimum premium applies)	\$5,000
Company Audit and Inspection Fees	\$150
Total Due At Inception At Binding	\$5,150
Minimum Earned Premium At Binding	25.00%
Commission	15.00%

Company Fees are fully earned

Premium is 100.00% minimum and deposit

Minimum Premium applies.

Taxes, fees and surcharges are the responsibility of the broker.

Policy Subject to Annual Audit.

Contingencies:

This Quote is subject to our receipt and acceptance of the following items:

Subject to favorable inspection and compliance with recommendations.

Signed and dated Supplement upon binding.

SL Tax Filing Form upon binding.

Prior to binding, please provide a sampling of warning labels that appear on products.

Comments:**Exclusions and Endorsements:**

CAS1001-0618 - Commercial General Liability Declarations - Claims Made

ADF9013-0419 - Notice - Where To Report A Claim

ADF4001-0110 - Schedule of Forms

CG0002-1001 - Commercial General Liability Coverage Form

CAN2002-0218 - Warranty Endorsement - Licensing Compliance

CAS2004-0110 - Deductible Endorsement

CAS2007-0817 - Common Conditions - Casualty

CAS2008-0110 - Amended Duties in the Event of a Claim or Suit - (Commercial General Liability - Claims Made)

CAS2009-1111 - General Liability Changes-Claims Made to Claims Made and Reported

CAS2013-0215 - Extended Reporting Period

ADF4002-0817 - Basis of Premium
 ADF4005-0212 - Composite Rate Endorsement
 CAS4004-0119 - Amendment - Supplementary Payments Inside Limits of Insurance
 CAS4018-0411 - Minimum Policy Premium
 CAS4029-1212 - Amendment - Premium Audit Conditions
 ADF3003-0519 - Exclusion - Absolute Pollution and Pollution Related Liability
 ADF3010-0110 - Exclusion- Nuclear, Biological or Chemical Materials
 ADF3011-0115 - Exclusion of Other Acts of Terrorism Committed Outside the United States; Exclusion of Punitive Damages Related to a Certified Act of Terrorism; Cap on Losses from Certified Acts of Terrorism
 ADF3013-0611 - Exclusion - Collection of Personal Identification Information
 CAN3001-0218 - Additional Policy Exclusions - Cannabis
 CAN3002-0218 - Exclusion - Cannabis Health Hazard
 CAN3003-1218 - Exclusion - Ingredients or Additives - Cannabis
 CAN3004-0218 - Exclusion - Impairment
 CAN3005-1218 - Exclusion - Caffeine or Alcohol - Cannabis
 CAN3006-0119 - Exclusion - Assault And Battery
 CAS3011-0110 - Exclusion- New Entities (Commercial General Liability)
 CAS3026-0110 - Exclusion - Prior Products(TBD - Policy Inception)
 CAS3097-0110 - Exclusion - Intellectual Property
 CAS3098-0110 - Exclusion- Named Insured vs. Named Insured
 CAS3108-0814 - Exclusion - Access or Disclosure of Confidential or Personal Information and Data-Related Liability - General Liability
 CAS3124-0616 - Exclusion - Violation of Statutes That Govern E-Mails, Fax, Phone Calls or Other Methods of Sending Material or Information
 CG2167-1204 - Fungi or Bacteria Exclusion
 CAN5001-0218 - Additional Insured - State or Political Subdivision
 CAN5002-0218 - Additional Insureds - Vendors(Blanket - As Required by Written Contract)
 CAS5003-0717 - Additional Insured - Primary and Non-Contributory Endorsement
 CAS5017-0419 - Additional Insured - Managers or Lessors of Premises as Required by Written Contract
 ADF9010-0115 - Notice of Terrorism Insurance Coverage
 IL0021-0908 - Nuclear Energy Liability Exclusion Endorsement (Broad Form)
 IL0985-0115 - Disclosure Pursuant to Terrorism Risk Insurance Act
 ADF9004-0110 - Signature Endorsement
 ADF9009-0110 - U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Advisory Notice to Policyholders
 CAS5006-0717 - Additional Insured As Required By Written Contract-Trade Event

This quote is subject to the specified conditions and may be withdrawn at any time prior to acceptance and in no event will it remain open beyond the quote expiration date unless extended by us in writing. Changes in classifications, operations, exposure or risk specific information require notification to us and may result in changes to this quote. Coverage may not be bound without written confirmation from us. Once bound, coverage may not be cancelled flat and the minimum earned premium will apply.

Kinsale Insurance Company
P. O. Box 17008
Richmond, VA 23226
(804) 289-1300

Restricting Access to Individuals Under 21

All employees and registered agents for Natural Agricultural Products must be 21 years of age or older. We will require Government issued documents with clearly legible birth dates to insure that all employees/agents are 21 years of age or older. Eligible documents include: current driver's license, passport, or state issued identification card. If there is any question of the validity of such document, the person will not be hired or allowed on the premises of Natural Agricultural Products, LLC. Copies of all identification will be kept on the premises

All visitors to Natural Agricultural Products facility shall have government documentation as stated above to demonstrate they are 21 years of age or older. Documentation will be verified and copied before said visitor is allowed on the premises. No identification, no entrance, no exceptions.

Quality Control and Testing Procedures

Natural Agricultural Products will prepare, cultivate, manufacture, package, store and dispose of marijuana and marijuana in a safe and sanitary manner. We will adhere to state requirements of sanitary standards for food establishments.

All female plants will be well cured and free of seeds, stems, dirt, sand, mold, rot, other fungus, pests and bacterial diseases.

All agents that come in contact with marijuana or marijuana products will be required to practice exceptional person hygiene.

Hand washing stations with running hot water will be located in production areas and antibacterial soap and paper towels will be provided for employees.

All employees will be wearing hospital grade gloves when handling products and will be required to change gloves when they have been compromised in any way.

Floors, ceilings, walls and building fixtures will be kept in a sanitary condition.

Tables, and utensils used in the cultivation and manufacturing of products will be food grade stainless steel and will not be touched by Agents' bare hands. They will be sanitized as frequently as necessary to protect against contamination. NAP will use a sanitizer approved for such use by the EPA.

All toxic materials (cleaners) will be stored in an area away from marijuana products and utensils used to handle said products.

Water will be adequate to be distributed throughout the facility as needed.

Plumbing will properly remove sewage and any liquid disposable waste from the facility.

Toilet facilities will be in good condition and sanitized daily.

Any products that support the growth of undesirable microorganisms will be stored in such a way to prevent the growth.

Waste products will be properly and promptly removed from the premises to avoid odor and the attraction of pests.

Storage and transport of marijuana and marijuana products will be conducted in a way that will protect them against physical, chemical, and microbial contamination. Storage areas will be maintained in a way as to allow for easy access for cleaning and sanitary purposes.

All transportation vehicles will maintain temperature control to maintain the integrity of the product being delivered.

All marijuana and marijuana products intended for sale and human consumption will not be available for sale until all testing is completed by a 3rd party Testing Facility.

Natural Agricultural Products will be using ProVerde Testing, located in Milford, Massachusetts.

Personnel Policies

Staffing plan – our staffing plan will take diversity into account when hiring qualified applicants for the positions available. Our management team is in place and the skill sets needed to fill each position has been determined. Employees will be provided with skills needed to assure that there are enough staff available to cover any and all positions when needed which will alleviate downtime due to employee absence. All staff of Natural Agricultural Products will meet all legal requirements put forth by the Cannabis Control Commission. Staff will be trained appropriately for their position as well as safety training, diversion training, and will be made aware of all state, city and Company rules and regulations. All personnel will be trained on Safe cultivation conditions. Job descriptions for each employee and organizational charts for reference will be made available to all personnel.

All personnel records for each employee will be maintained for a year after the termination of the employee's affiliation with Natural Agricultural Products.

Written Personnel records will contain the following:

- job descriptions for each employee position.
- organizational charts consistent with the job description
- Application for registration of a marijuana establishment agent including:

Full name, date of birth, address, all aliases used previously or currently by the individual including maiden name if any

Verifiable identity document acceptable to the commission for each applicant.

An attestation that the individual will not engage in the diversion of marijuana or marijuana products

Written acknowledgment by applicant of any limitations of their authorization to handle or possess marijuana in any way in the commonwealth of Massachusetts.

Background information – CORI check

-Documentation of verification of references, copies of identification and agent card.

-Employee signed copy of job description and employment contract that include responsibilities, duties, qualifications, COMPANY POLICIES and supervisor.

-A signed statement from employee indicating attendance of trainings. Will include name of presenter, date, time, place and type of training. Also record of responsible vendor and 8 hour related duty training

-Performance evaluations signed and dated by both employee and evaluator

CONFIDENTIAL RECORDS WILL BE MAINTAINED IN THE FOLLOWING MANNER: ALL WRITTEN (HARD COPY) RECORDS WILL BE MAINTAINED IN A

LOCKED CABINET LOCATED IN A LOCKED OFFICE. ONLY THE EXECUTIVE OFFICERS WILL HAVE ACCESS TO THIS INFORMATION. THE WRITTEN INFORMATION IS NOT TO LEAVE THE OFFICE. ALL ELECTRONIC CONFIDENTIAL INFORMATION WILL BE PASSWORD PROTECTED AND AVAILABLE ONLY TO EXECUTIVE OFFICERS. ALL PASSWORDS WILL BE CHANGED AT VARIOUS INTERVALS TO DISSUADE FROM ACCESS. ALL CONFIDENTIAL DATA WILL BE ENCRYPTED FOR PROTECTION.

All labor law posters will be in a conspicuous place for employee reference.

Staff meetings will be held monthly and are mandatory.

INCLUDED IN THE WRITTEN OPERATING PROCEDURES WILL BE THE FOLLOWING POLICY REGARDING ALCOHOL, DRUG AND SMOKE FREE WORKPLACE:

THERE WILL BE NO ALCOHOL USE OR DRUG USE ALLOWED ON THE PREMISES AT ANY TIME. IF AN EMPLOYEE IS USING DRUGS OR ALCOHOL ON THE PREMISES, THEY WILL BE TERMINATED IMMEDIATELY. SMOKING IS PROHIBITED IN ALL AREAS EXCEPT THE DESIGNATED AND MARKED SMOKING AREA AT THE FAR END OF THE PARKING LOT THAT WILL BE EQUIPPED WITH CIGARETTE DISTINGUISHING DEVICES. THIS POLICY WILL BE EXPLAINED BOTH VERBALLY AND IN WRITING (IN THE EMPLOYEE'S DOMINANT LANGUAGE TO AVOID ANY CONFUSION) DURING THE INITIAL INTERVIEW. EMPLOYEES WILL BE REQUIRED TO SIGN THAT THEY UNDERSTAND AND WILL COMPLY WITH THIS POLICY. THERE WILL BE NO EXCEPTIONS. THERE WILL ALSO BE WRITTEN COPIES OF THE POLICY POSTED IN AREAS BOTH IN AND OUTSIDE OF THE FACILITY TO REINFORCE SAID POLICY.

Our policy calls for the immediate dismissal and the reporting to Law Enforcement Authorities and the CCC of any Marijuana Establishment Agent who has diverted marijuana.

Our policy calls for the immediate dismissal and the reporting to the CCC of any Marijuana Establishment Agent who engages in unsafe practices with regard to operation of the marijuana Establishment

Our policy calls for the immediate dismissal of any Marijuana Establishment Agent who has 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 of Massachusetts or a like violation of any other jurisdiction.

Maintenance of Financial Records Plan

Natural Agricultural Products has employed a professional accountant/bookkeeper with over 20 years of experience managing the financial records of several successful businesses. All of our business, financial, and personnel records shall be maintained by an experienced bookkeeper and experienced comptroller. Both hard copy and electronic information will be produced with the utmost professionalism in accordance with GAAP's 10 main principles of accounting: Principle of Regularity, Principle of Consistency, Principle of Sincerity, Principle of Methods, Principle of Non-Compensation, Principle of Prudence, Principle of Continuity, Principle of Periodicity, Principle of Full Disclosure, and Principle of Utmost Good Faith

All financial information will be electronically stored in encrypted servers accessible only to Executive Managers. A third party cyber security company will be available to assess our systems if necessary.

Financial information will be made readily available to the Cannabis Control Commission upon request.

Company Financial Records will include (but not limited to)

- a list of all assets and liabilities.
- all financial transactions and bank statements
- journals
- sales records that list the quantity, form and cost of marijuana products
- waste disposal records
- inventory records
- ledgers and supporting documents
- checks and invoices
- transportation manifests
- legal documents
- salary, wages, stipends, compensation, bonuses, or any other benefit or item of value paid to any employee or person having direct or indirect control of Natural Agricultural Products.

Qualifications and Intended Trainings for Agents

All employees of Natural Agricultural Products will be trained prior to performing job functions. Training will be tailored to the roles and responsibilities of the job that is to be performed

The following is a list of anticipated positions and their qualifications/responsibilities:

PRESIDENT: Develops the vision of the company, creates and implements policies, manages strategic development and monitors the company's financials and production. Responsible for the overall performance of the company as a whole. Monitoring of financials and insuring that resources are used efficiently, signing all contracts on behalf of the company. All fiscal responsibility as well as the company's bottom line accountability is attributed to the president.

BOOKKEEPER: Responsible for the company's financials. ensure bills are paid, reports are made, cash is accounted for and payroll. Will monitor transactions and properly record them in the correct computer system. Responsible for verifying all cash and bank deposits and receipts, preparing monthly journal entries and all financial statements as required or requested. Responsible for all manifests of inventory for product coming into or leaving the facility

COMPTROLLER: the comptroller provides a layer of checks and balances to the bookkeeper, harvesting staff and cultivation center manager to assure all finances and product are accounted for and that all reports are accurate, on time and within regulation. Will serve as the company human resource agent, handling all company benefits. The comptroller is responsible for checking all inventory, deposits, receipts reports, accounts payable/receivable, and ensuring an effective, efficient and solid audit trail is available for compliance officials or any other professional engaged, contracted or any way other affiliated with the company.

CULTIVATION CENTER MANAGER: day to day responsibility of the cultivation center. Ensure that the center is within compliance at all times and operating to its fullest capabilities. Ensures plants are tended to, nutrients are fed, water is stabilized, lights are checked, soil levels/temperatures/humidity is appropriate, soil is tested finished product is tested and mechanical infrastructure is maintained. Responsible for all employees inputting information into the seed to sale software correctly. Responsible for all nutrients, soils, containers, and any other cultivation related supplies are properly stored, maintained, and ordered as necessary. Responsible for all inventory in all life cycles are accounted for, and that finished product is packaged and sent to correct locations and is safe for consumption.

MASTER GROWER: directly in charge of the plants within the facility, ensures all processes and procedures are followed and all plants in the various cycles are healthy. Manages cycles, individual strains, potency, efficiency and health. Master grower will ensure pH levels of water are correct, proper dosing of nutrients, soil/temperature/humidity levels are in order, and equipment is functioning properly. Master grower will train trimmers and harvesting staff the proper techniques, processes and procedures. To ensure consistent feeding, manicuring and harvesting is shown to all plants in all cycles in order to maximize yields. Our master grower has 15+ years of experience within the medical/recreational cannabis industry.

TRIMMERS AND HARVESTING STAFF: will be trained by master grower. Trimmers will cut, shape and maximize plant growth by removing non-productive leaves and shaping the plants

to maximize efficiency in nutrient uptake and light absorption. Trimmers will coordinate the packaging and utilizing of excess trimmings to be destroyed. Harvesting staff will harvest buds off of matured plants. They will also be responsible for the physical inventory by matching each plant's RFID tag (or other identifying mark) to an inventory sheet produced by the seed to sale software. They will also label product for the drying/curing room and that all plant material is weighed and entered into the tracing database. They will remove buds from female plants insuring the trichomes aren't damaged and batch different strains together on specific drying racks.

PACKAGING/LABELING EMPLOYEES: Responsible for weighing, measuring, proportioning, packaging and labeling all matured flower and finished product. Ensuring proper inventory is input into the seed to sale tracking software. Assure that all packaged marijuana products are traceable back to a particular grow and from what seeds/clones they were grown.

SECURITY: responsible for the safety of all employees and the facility. Will patrol grounds and observe through cameras and interface with management or document any weakness found. Responsible for insuring all inventory is appropriately located and is not removed from the premises without proper documentation. Responsible for observing all employees throughout the day to avoid any possible theft, robbery, collusion, or any other infraction.

MARKETING: Responsibility is to achieve the greatest market share possible by increasing awareness within the industry and target market.

DRIVERS: Drivers will transport marijuana from the cultivation facility to dispensaries across the state. They operate in pairs, in vehicles equipped with GPS and 2 separate forms of communication. The vehicle will not be marked with any identifying markers making it obviously a marijuana delivery vehicle. Drivers will ensure the correct product is delivered to the correct location in a timely manner. Drivers are responsible for following the manifest given to them when on delivery, the safe keeping of all inventory in locked safes within the vehicle, for accepting payment and providing manifests. They are also responsible for reporting failed or unaccepted deliveries.

Seed to Sale tracking agents will receive training determined by the commission.

All employees of Natural Agricultural Products will attend and successfully complete a Responsible Vendor Training Program within 90 days of hire. This training program will be required every year for any person that will/may handle marijuana at the cultivation facility to maintain designation as a "Responsible Vendor".

Responsible Vendor Training certificates will be maintained for four years and be made available to the Commission upon request.

Responsible Vendor Training will consist of at least 2 hours in a classroom setting of face to face, interactive training. All employees will obtain a test score of 70% or better to be designated as a Responsible Vendor.

All employees will receive training in the following areas:

- The effects of different types of marijuana on the mental and physical health of the human body.
- Diversion prevention and best practices to prevent sales to minors.

- Compliance with all tracking requirements
- How to identify legitimate and false identification cards
- sanitary procedures
- waste disposal procedures

All employees will receive a minimum of eight hours of ongoing training annually.

All Natural Agricultural Products Managers and Supervisors will be required to read the most updated version of the 935CMR:Cannabis Control Commission Adult Use of Marijuana

Diversity Plan

The following is a plan by Natural Agricultural Products to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation 935 CMR 500.101(1)(c)(7)(k); 935 CMR 500.101(2)(e)(8)(k).

Natural Agricultural Products is dedicated to providing everyone with the tools or opportunities they need to be successful and leveling the playing field for all. Natural Agricultural Products, LLC is a diverse Corporation that has 5 people in its employ at this time. Of those 5 employees, 60% are considered minorities by the definition set forth by the CCC. The aforementioned minorities are all in higher management positions. We are eager to promote equity for minorities, women, veterans, people with disabilities and those who identify as members of the LGBTQ+ community in the operations of our Marijuana Establishment.

WE ARE AN EQUAL OPPORTUNITY EMPLOYER AND DO NOT DISCRIMINATE BASED ON GENDER OR GENDER IDENTIFICATION, VETERAN STATUS, RACE, COLOR, RELIGION, NATIONAL ORIGIN, SEXUAL ORIENTATION, DISABILITY, MARITAL STATUS OR AGE

GOAL – The Goal of Natural Agricultural Products is to have 50% of our future employees be members of the demographic set forth by the Cannabis Control Commission: Minorities, Women, Veterans, People with disabilities and those who identify as members of the LGBTQ+ community. Of the 50% of new hires, our establishment intends to hire at least 25% of applicants that identify as female.

PROGRAM – Our program to promote equity of the identified groups and include them in the operation of Natural Agricultural Products is multi-faceted;

- (a) Natural Agricultural Products will post monthly advertisements in the local newspaper (The Enterprise), encouraging members of the demographic set forth by the Cannabis Control Commission to apply. We will interview every applicant generated from this advertisement.
- (b) We will contact the local unemployment office monthly requesting they release information about Natural Agricultural Products and offer all those interested persons an application. We will evaluate and interview all applicants.
- (c) We will encourage current employees on a regular basis to recommend individuals falling into the demographics set for by the Cannabis Control Commission. Those applicants will be interviewed immediately upon Natural Agricultural Products receiving an application for employment.

MEASUREMENTS – National Agricultural Products will measure the success of our goal by utilizing the metrics listed below.

- (a) Upon each new hire of a member of the demographics, we will request they identify which of the programs they participated in to obtain their position with the Establishment.
- (b) Natural Agricultural Products will then calculate the number of employees hired and compare it to the number of employees that are members of the targeted demographic group to ensure that our goal of 50% has been met, and that 25% of that number is comprised of those that identify as female.

THIS DIVERSITY PLAN IS PRACICAL AND NATURAL AGRICULTURAL PRODUCTS INTENDS TO FULLY IMPLEMENT IT AND ACHIEVE SUCCESS. WE WILL EVALUATE THE PROGRESS OF THIS PLAN QUARTERLY IN PREPARATION FOR DEMONSTRATING SUCCESS TO THE CANNABIS CONTROL COMMISSION UPON LICENSE RENEWAL.

NATURAL AGRICULTURAL PRODUCTS COMPLIES WITH THE FOLLOWING STATEMENTS.

Natural Agricultural Products 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 Marijuana Establishments.

Natural Agricultural Products states that any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Record Keeping Procedures

All of our business, financial, and personnel records shall be maintained by an experienced bookkeeper and experienced comptroller. Both hard copy and electronic information will be produced with the utmost professionalism in accordance with GAAP's 10 main principles of accounting: Principle of Regularity, Principle of Consistency, Principle of Sincerity, Principle of Methods, Principle of Non-Compensation, Principle of Prudence, Principle of Continuity, Principle of Periodicity, Principle of Full Disclosure, and Principle of Utmost Good Faith

The following personnel records shall be maintained:

- job descriptions for each employee position.
- organizational charts consistent with the job description
- Application for registration of a marijuana establishment agent including:
 - Full name, date of birth, address, all aliases used previously or currently by the individual including maiden name if any
 - Verifiable identity document acceptable to the commission for each applicant.
 - An attestation that the individual will not engage in the diversion of marijuana or marijuana products
 - Written acknowledgment by applicant of any limitations of their authorization to handle or possess marijuana in any way in the commonwealth of Massachusetts.
 - Background information – CORI check
 - Documentation of verification of references, copies of identification and agent card.- Employee signed copy of job description and employment contract that include responsibilities, duties, qualifications, COMPANY POLICIES and supervisor.-A signed statement from employee indicating attendance of trainings. Will include name of presenter, date, time, place and type of training. Also record of responsible vendor and 8 hour related duty training
- Performance evaluations signed and dated by both employee and evaluator
- staffing plan consisting of business hours and safe cultivation conditions and practices.

Seed to Sale tracking records for all marijuana as required by 935 CMR 500.105(8)(e), 935 CMR 500.105(9)

NATURAL AGRICULTURAL PRODUCTS WILL BE EQUIPPED WITH MTRC SEED TO SALE TRACKING TO KEEP RECORD AND INVENTORY OF ALL PRODUCT FROM THE MOMENT THE SEED GOES INTO SOIL THROUGH END SALE.

All records will be saved in the company's servers and a monthly inventory of all marijuana in the process of cultivation and finished, stored Marijuana. We will conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory. Natural Agricultural Products will attach plant tags to all marijuana, clones and plants and attach package tags to all finished products.

Natural Agricultural Products shall keep waste records for at least three years.

Natural Agricultural Products shall maintain written operating procedures on the premises that will be available to the CCC when requested. These operating procedures shall include:

- *Security Plan
- *Employee security policies, including personal safety and crime prevention techniques
- *A description of the marijuana establishment's hours of operation and after hours contact information.
- *storage and waste disposal of marijuana
- *description of the various strains of marijuana to be cultivated, processed or sold and the forms in which marijuana will be sold
- *price list for marijuana and marijuana products and any other available products.
- *procedures to ensure accurate recordkeeping, inventory protocols for transfer and inventory.
- *Plans for quality control, including product testing for contaminants.
- *A staffing plan and staffing records
- *Emergency procedures including a disaster plan with procedures to be followed in case of fire or other emergencies
- *Alcohol, smoke and drug free workplace policies
- *The plan describing how confidential information and other records required to be maintained confidentially will be maintained
- *A policy for the immediate dismissal of any marijuana establishment agent who has:
 - diverted marijuana which shall be reported to law enforcement authorities and to the commission
 - engaged in unsafe practices with regard to operation of the marijuana establishment which shall be reported to the commission
 - been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth or a like violation of any other jurisdiction.
- *A list of all board of directors, members and executives and members of the licensee will be made available on the marijuana establishment's website
- *Policies and procedure for the handling of cash on the facility including but not limited to: storage, collection frequency, transport to financial institutions , to be available on inspection
- *Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

*Policies and procedures for energy efficiency and conservation that shall include:

- Identification of potential energy use reduction opportunities such as natural lighting, heat recovery ventilation and energy efficiency measures and a plan for implementation of such opportunities

- Consideration of opportunities for renewable energy generation including building plans showing where energy generators could be placed on the site and an explanation of why the identified opportunities were not pursued, if applicable

- Strategies to reduce electric demands

- Engagement with energy efficiency programs offered through municipal lighting plants

- Policies and procedures to promote workplace safety consistent with standards set the occupational safety and health administration , including plans to identify and address any biological, chemical or physical hazards. which will include a hazard communication plan, personal protective equipment assessment a fire protection plan and an emergency action plan.

The following business records shall also be maintained

- Assets and liabilities

- Monetary transactions

- Books of accounts

- Sales records

- Salary and wages paid to each employee