Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281622

Original Issued Date: 09/10/2020

Issued Date: 09/10/2020

Expiration Date: 09/10/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: NEO Manufacturing MA LLC

Phone Number: 415-519-1063

Email Address: jlewis@Neoalts.com

Business Address 1: 365 Boston Post RD #184

Business Address 2:

Business City: Sudbury

Business State: MA

Business Zip Code: 01776

Mailing Address 1: 365 Boston Post RD #184

Mailing Address 2:

Mailing City: Sudbury

Mailing State: MA

Mailing Zip Code: 01776

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:

Percentage Of Control:

Role: Employee

Other Role:

First Name: Adam **Last Name:** Patti **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: **Percentage Of Control:**

Role: Employee **Other Role:**

First Name: Chadwick **Last Name:** Blair **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: **Percentage Of Control:**

Role: Employee **Other Role:**

First Name: Jaime **Last Name:** Lewis **Suffix:**

Gender: Female **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: **Percentage of Ownership:** 100

Entity Legal Name: NEO Organics MA LLC **Entity DBA:** **DBA City:**

Entity Description: The general character of the business of the LLC shall be investing in and providing services to entities engaged in the sale of cannabis products, and any other business in which a Massachusetts limited liability company is authorized to engage. The LLC will not engage in any activity requiring the approval and endorsement of the Cannabis Control Commission until such authorizations have been received.

Foreign Subsidiary Narrative:

Entity Phone: 917-319-4683 **Entity Email:** apatti@neoalts.com **Entity Website:**

Entity Address 1: 365 Boston Post RD #184 **Entity Address 2:**

Entity City: Sudbury **Entity State:** MA **Entity Zip Code:** 01776

Entity Mailing Address 1: 365 Boston Post RD #184 **Entity Mailing Address 2:**

Entity Mailing City: Sudbury **Entity Mailing State:** MA **Entity Mailing Zip Code:** 01776

Relationship Description: NEO Manufacturing MA LLC is solely owned by the parent company NEO Organics MA LLC and has direct authority over NEO Manufacturing MA LLC

Entity with Direct or Indirect Authority 2

Percentage of Control: 100 **Percentage of Ownership:**

Entity Legal Name: NEO ALTERNATIVES LLC **Entity DBA:** **DBA City:**

Entity Description: Investment management fund

Foreign Subsidiary Narrative:

Entity Phone: 917-319-4683 **Entity Email:** apatti@neoalts.com **Entity Website:**

Entity Address 1: 257 Country Way Rd **Entity Address 2:**

Entity City: Needham **Entity State:** MA **Entity Zip Code:** 02492

Entity Mailing Address 1: 257 Country Way Rd **Entity Mailing Address 2:**

Entity Mailing City: Needham **Entity Mailing State:** MA **Entity Mailing Zip Code:** 02492

Relationship Description: NEO Alternatives LLC is the Manager of NEO Manufacturing MA LLC with indirect authority

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: NEO Organics MA LLC **Entity DBA:**

Email: apatti@neoalts.com **Phone:** 857-342-5557

Address 1: 365 Boston Post RD #184 **Address 2:**

City: Sudbury **State:** MA **Zip Code:** 01776

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of Capital Provided:** $500000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Adam **Last Name:** Patti **Suffix:**

Marijuana Establishment Name: NEO Manufacturer MA, LLC **Business Type:** Marijuana Cultivator

Marijuana Establishment City: MEDWAY **Marijuana Establishment State:** MA

Individual 2

First Name: Chadwick **Last Name:** Blair **Suffix:**

Marijuana Establishment Name: NEO Manufacturer MA, LLC **Business Type:** Marijuana Cultivator

Marijuana Establishment City: MEDWAY **Marijuana Establishment State:** MA

Individual 3

First Name: Jaime **Last Name:** Lewis **Suffix:**

Marijuana Establishment Name: NEO Manufacturer MA, LLC **Business Type:** Marijuana Cultivator

Marijuana Establishment City: MEDWAY **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 4 Marc Rd

Establishment Address 2:

Establishment City: Medway **Establishment Zip Code:** 02053

Approximate square footage of the Establishment: 28582 **How many abutters does this property have?:** 10

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
Certification of Host Community Agreement	NEO MAN Executed Host Agreement Docs_1 (1) (1).pdf	pdf	5c9226f3293a5312448ec815	03/20/2019
Community Outreach Meeting Documentation	NEO MAN Community Outreach Attestation form.pdf	pdf	5c9228dbeadf341230f6aef9	03/20/2019
Community Outreach Meeting Documentation	Attachment B .pdf	pdf	5df9b396f76dd253236e120c	12/18/2019
Community Outreach Meeting Documentation	Attachment B - (2).pdf	pdf	5df9b450cb8cc6573ebd0441	12/18/2019
Community Outreach Meeting Documentation	Attachment C .pdf	pdf	5e5ed022d21b9346780e0d3e	03/03/2020
Community Outreach Meeting Documentation	Newspaper.pdf	pdf	5e712abdf0445c357cb03aaa	03/17/2020
Plan to Remain Compliant with Local Zoning	Plan to remain complaint .pdf	pdf	5e72ac421cdd2e3910a4f875	03/18/2020

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	MAN - Postive Impact Plan - (2) .pdf	pdf	5e72ad36b7c619391b8b6272	03/18/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Employee **Other Role:**

First Name: Adam **Last Name:** Patti **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Employee **Other Role:**

First Name: Chadwick **Last Name:** Blair **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Employee **Other Role:**

First Name: Jaime **Last Name:** Lewis **Suffix:**

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:**

Entity Legal Name: NEO Organics MA LLC **Entity DBA:**

Entity Description: NEO Organics LLC providing financing for the entire project. NEO Organics also certifies that all funds were and will be lawfully obtained in accordance with regulation. The authority of Neo Organics is none. The Authority is left to the executives of Neo Manufacturing

Phone: 917-319-4683 **Email:** apatti@neoalts.com

Primary Business Address 1: 365 Boston Post RD #184 **Primary Business Address 2:**

Primary Business City: Sudbury **Primary Business State:** MA **Principal Business Zip Code:** 01776

Additional Information:

Entity Background Check Information 2

Role: Other (specify) **Other Role:** Manager

Entity Legal Name: NEO Alternatives LLC **Entity DBA:**

Entity Description: INVESTMENT MANAGER OF PRIVATE EQUITY FUND

Phone: 917-319-4683 **Email:** apatti@neoalts.com

Primary Business Address 1: 257 Country Way **Primary Business Address 2:**

Primary Business City: Needham **Primary Business State:** MA **Principal Business Zip Code:** 02492

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	NEO MAN SOS (1).pdf	pdf	5c9231103779161b2a87693e	03/20/2019
Department of Revenue - Certificate of Good standing	NEO TAX good Standing (1).pdf	pdf	5c92311f5d4b0b1b3ebc36a8	03/20/2019
Bylaws	NEO Manufacturing MA LLC Operating Agreement (1)-compressed.pdf	pdf	5c923cce3d84de123a614805	03/20/2019
Articles of Organization	MAN - Articles of Corp .pdf	pdf	5df99cdecb8cc6573ebd041c	12/17/2019

No documents uploaded

Massachusetts Business Identification Number: 001330154

Doing-Business-As Name:

DBA Registration City: Medway

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	NEO Manufacturing Liability Insurance.pdf	pdf	5c9236bc9ff0081b4821daec	03/20/2019
Proposed Timeline	NEO Operations timeline.pdf	pdf	5dfadd4dcb8cc6573ebd0754	12/18/2019
Business Plan	MAN BP .pdf	pdf	5e71332ebddf0438d21d8d00	03/17/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Prevention of diversion	NEO Manufacturing Prevention of Diversion.pdf	pdf	5c9238668d16491b5c0fb69f	03/20/2019
Storage of marijuana	NEO Manufacturing Storage of Marijuana.pdf	pdf	5c9239aac4b7a71b66d15ffc	03/20/2019
Inventory procedures	NEO Manufacturing Inventory Procedures.pdf	pdf	5c9239d85fd63c1b24eb8873	03/20/2019
Dispensing procedures	NEO Manufacturing Dispensing Procedures.pdf	pdf	5c9239f85d4b0b1b3ebc36c0	03/20/2019
Maintaining of financial records	NEO Manufacturing Maintaining of Financial Records.pdf	pdf	5c923a273779161b2a87695c	03/20/2019
Restricting Access to age 21 and older	MAN - Access Restriction to Individuals under 21-NEO 11.12.pdf	pdf	5df9a018541f65570b94630d	12/17/2019
Personnel policies including background checks	MAN - Personnel Policies .pdf	pdf	5df9a03dfab70557127eea4c	12/17/2019
Transportation of marijuana	MAN -Transportation Policies.pdf	pdf	5df9a05a00f72d57285ed613	12/17/2019
Method used to produce products	MANU-Production Methods .pdf	pdf	5df9a0710557385733b40b26	12/17/2019
Qualifications and training	Manu-Qualifications and training .pdf	pdf	5df9a07e38abaf57497a9c47	12/17/2019
Quality control and testing	MANU-Quality control and testing .pdf	pdf	5df9a085541f65570b946311	12/17/2019
Sample of unique identifying marks used for branding	NEO MAN - Unique Identifying Mark.pdf	pdf	5df9a0dbcb8cc6573ebd042b	12/17/2019
Record Keeping procedures	MAN -Recordkeeping .pdf	pdf	5df9a51fbb37d053183ddb11	12/17/2019
Security plan	MAN - Security Plan .pdf	pdf	5df9ab3c5e2d54535a9c11ef	12/17/2019
Types of products Manufactured.	MAN-Types of products Manufactured (2) .pdf	pdf	5e72adebb014bf38e46ca9bf	03/18/2020
Diversity plan	NEO MAN DP 2020.pdf	pdf	5e836c5bf0445c357cb068a2	03/31/2020

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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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, Jaime Lewis, (*insert name*) certify as an authorized representative of NEO Manufacturing MA, LLC (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Medway, MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 03/05/2019 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Dennis Crowley, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Medway, MA (*insert name of host community*) to certify that the applicant and Town of Medway, MA (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 03/05/2019 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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, Jaime Lewis, (*insert name*) attest as an authorized representative of Neo Manufacturing MA (*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 March 14, 2019 (*insert date*).

2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on March 8th 2019 (*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 March 5, 2019 (*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 March 6th, 2019 (*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*).

Initials of Attester: JL

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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.

Initials of Attester: _____

"Attachment B."

Attn: Charlene Tingley
Assistant Town Clerk
155 Village St.
Medway, MA 02053

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

“Attachment B.”

Medway MASSACHUSETTS

Published on *Town of Medway MA* (https://www.townofmedway.org)

NEO Manufacturing & NEO Cultivation MA, LLC Community Outreach Meeting

Event Date:
Thursday, March 14, 2019 - 7:00pm

Related Agenda

NEO Manufacturing & NEO Cultivation MA, LLC Community Outreach Meeting

Submitted on March 6, 2019 - 8:47am
Upload file:
neo_notice_of_community_outreach_meeting_tc.pdf
Date:
Thursday, March 14, 2019 - 7:00pm
Related Event:
NEO Manufacturing & NEO Cultivation MA, LLC Community Outreach Meeting

Source URL: https://www.townofmedway.org/town-clerk/events/88963

Attachment C

[redacted]
35 Coffee Street
Medway MA 02053

Parcel ID: 23-061

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]

Attachment C

20533 SE Evergreen Highway
Camas WA
98607

Parcel ID: 32-026

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]

Attachment C

730 Main Street Unit 2A
Millis MA 02054

Parcel ID: 32-027

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]

Attachment C

730 Main Street Unit 2A
Millis MA 02054

Parcel ID: 33-001

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]

Attachment C

45 Coffee Street
Medway MA 02053
Parcel ID: 32-031

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]
P O Box 368
Dover MA
02030

Attachment C

Parcel ID: 33-002

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

Attachment C

[redacted]
43 Coffee Street
Medway MA
02053

Parcel ID: 32-032

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

[redacted]

Attachment C

730 Main Street Unit 2A
Millis MA 02054

Parcel ID: 32-028

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

Attachment C

[redacted]
35 Coffee Street
Medway MA 02053

Parcel ID: 32-025

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

Attachment C

[redacted]
35 Coffee Street
Medway MA 02053

Parcel ID: 24-010-0001

RE: Notice of Public Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

Legal Notices

MEADOWVIEW CONDOMINIUMS
LEGAL NOTICE
A.C. 92A
COMMONWEALTH OF MASSACHUSETTS
WORCESTER, SS.
PROBATE COURT
19E0021PP

Worcester Distr...
65, 67 and 69.

setting forth that her desires that —. all.— the aforesaid described part—of said land may be sold at private sale for not less than $500,000.0000 dollars, and praying that 'partition may be made of all the land aforesaid, according to law, and to that end that a commissioner be appointed to make such partition and be ordered to make sale and conveyance of all, or any part of said land which the Court finds cannot by advantageously divided either at private-sale or public auction, and be ordered to distribute for net proceeds thereof.

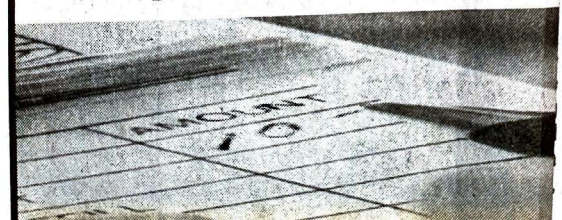
If you desire to object thereto you or your attorney should file a written appearance in said Court at Worcester before ten o'clock in the forenoon on the nineteenth day of March 2019 the return day this citation.

Witness, LEILAH A. KEAMY,Esquire, First Judge of said Court this fifteenth day of February 2019.

Stephanie K. Fattma
Register of Probat

AD#1377
MDN 2/22, 3/1, 3/8/19

Whether you're looking for the right job or looking to fill a job
Wicked Local Jobs
will get the job done.



Lega

MACKENZIE ESTATE
LEGAL NOTICE
Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Norfolk Probate and Famil...
03/08/2019

MARIJUANA
LEGAL NOTICE
Notice of Public Community Outreach Meeting

A Notice is hereby given that a Community Outreach Meeting for a NEO Manufacturing MA, LLC and NEO Cultivation MA, LLC will be held. The meeting will be on a proposed Marijuana Product Manufacturer Establishment and a Proposed Marijuana Cultivation Establishment, which is anticipated to be located at 4 Marc Road Medway MA.

DATE AND TIME: March 14th 2019 at 7 PM

PLACE: Medway Senior Center, 76 Oakland Street, Medway, MA 02053

SUBJECT MATTER: There will be a brief presentation on the Company's security, compliance and positive community impact plan. There will also be an opportunity for the public to ask question of the of NEO representatives.

AD#13778157
MDN 3/8/19

LEGAL

Plan to Remain Compliant with Local Zoning

The Town of Medway amended its zoning code at an Annual Town Meeting on May 21, 2018 to permit the cultivation and production of marijuana for adult-use in the Business / Industrial ("BI"), East Industrial ("EI") and West Industrial ("WI") zoning districts. Please see the attached relevant sections of the Annual Town Meeting Warrant for your reference.

NEO Manufacturing MA, LLC (the "**Company**"), is proposing to develop and operate a Marijuana Establishment, and more specifically a Marijuana Product Manufacturer (the "**Facility**"), at 4 Marc Road, Medway, MA (the "**Property**"). The Property is located in the East Industrial zoning district, which permits the operation of a Marijuana Product Manufacturer, by the granting of a Special Permit from the Planning Board pursuant Section 8.10 and 5.4 of the Town of Medway Zoning Bylaw.

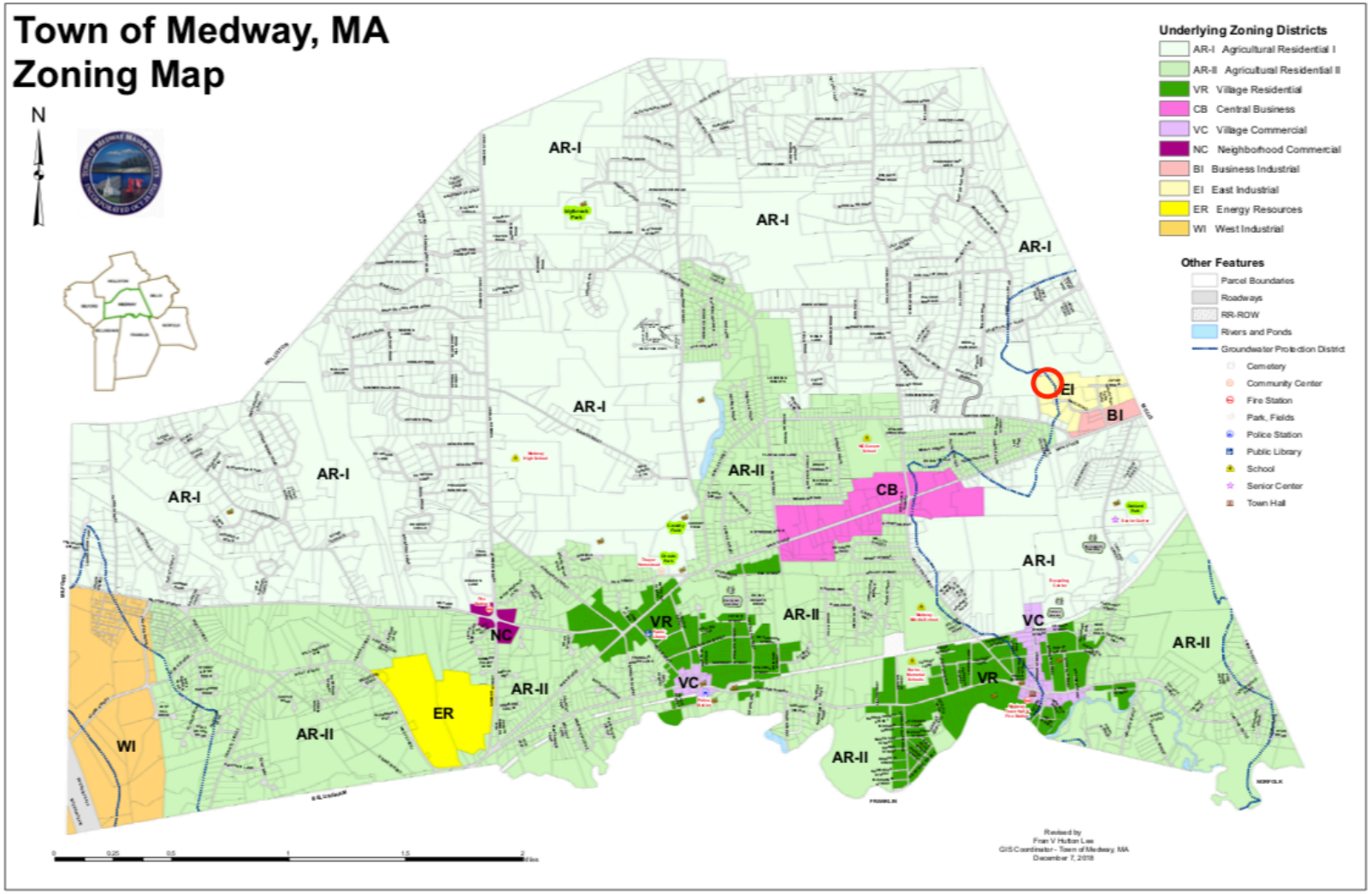
The Company has discussed its marijuana product manufacturing and Culitvation facility with town officials, including the building department, police department, fire department, and town manager's office and has appeared before the Board of Selectmen and entered into a host community agreement with the Town.

The Company plans to continue to work with officials from the Town to ensure the operations will have a positive impact on the community and will work diligently to obtain all necessary approvals and permitting. The Company is actively engaged in preparing the necessary civil engineering and architectural plans for its Special Permit application and intends to submit such application within the next 60 days.

NEO was approved for a special permit. The Planning Board for the Town of Medway, approved NEO on January 2020. However we have sound and noise reports we must submit annually to the Planning Board. Please see the the attached document showing the filing with the Norfolk Register of Deeds

The Company hereby submits that it will continue to comply with all local and state requirements and its head of operations, Jamie Lewis, will be responsible for ongoing compliance with local and state rules and regulations.

Town of Medway, MA
Zoning Map



DIMENSIONAL REGULATIONS

Zoning District	Minimum Lot Size (sq. ft.)	Minimum Frontage (ft.)	Minimum Setbacks (ft.) [c] Front, Side, Rear
AR-I	44,000	180	35, 15, 15
AR-II	22,500 [a,b]	150	35, 15, 15
VR	22,500 [a,b]	150	20[d], 10[d], 10[d]
CB	10,000	NA	10, 10, 25[e]
VC	10,000	NA	20[d], 10[d], 10[d]
C-V	20,000	NA	35, 15, 15
BI	20,000	75	25, 15, 15
I-I	20,000	100	30, 20, 30
I-II	20,000	150	30, 20, 30
I-III	40,000	100	30, 20, 30

Be advised that not all Dimensional and Density Regulations are included in the table above. Please refer to the Medway Zoning Bylaw, Section 6.1 Dimensional and Density Regulations.

ADAPTIVE USE OVERLAY DISTRICT (AUOD)

To promote economic development and to preserve community character by encouraging conversion of existing residential buildings in certain older neighborhoods to limited business and mixed uses. Special permit use.

MULTIFAMILY HOUSING OVERLAY DISTRICT (MHOD)

To encourage the provision of a diversity of housing types, to promote pedestrian oriented developments, and to increase the number of affordable housing units in a designated area by authorizing multifamily dwelling units and developments in a designated area. Special permit use.

FLOOD PLAIN / WETLAND PROTECTION DISTRICT

To prevent public emergencies resulting from water quality contamination and pollution, to avoid loss of utility services, to eliminate costs of responding to and cleaning up, and to reduce damage to public and private property all resulting from flooding waters.

GROUNDWATER PROTECTION DISTRICT

To protect the MA Department of Environmental Protection designated Zone II recharge areas in order to ensure an adequate quantity and quality of drinking water for Medway residents, institutions and businesses and to preserve and protect existing and potential sources of drinking water supplies.

Please also refer to the Medway Zoning Bylaw, Section 5.6, Overlay Districts, and Section 8, Special Regulations.

Prepared for the
Medway Planning & Economic Development Board
155 Village Street, Medway, MA 02053
508-533-3291 planningboard@townofmedway.org
Data provided by Town of Medway and MassGIS

The information on this map is believed to be correct, but errors in data entry or transmission may occur. The map is not to be used for legal purposes.
The information on this map is subject to change or revision at any time.

Recreational Marijuana Retailer: An entity licensed to purchase and deliver marijuana and marijuana products from marijuana establishments and to deliver, sell or otherwise transfer marijuana and marijuana products to marijuana establishments and to consumers.

Recreational Marijuana Establishment (RME): A marijuana independent testing laboratory, marijuana product manufacturer, or marijuana cultivator, all as defined in General Laws chapter 94G, §1, but not including Recreational Marijuana Retailers or Recreational Marijuana Social Consumption Establishments.

And by deleting Section 8.10 TEMPORARY MORATORIUM ON NON-MEDICAL MARIJUANA ESTABLISHMENTS and replacing it with the following:

8.10 RECREATIONAL MARIJUANA

A. Purposes. The purposes of this Section are to address possible adverse public health and safety consequences and impacts on the quality of life of the Town of Medway related to the passage of Chapter 5 of the Acts of 2017 regarding recreational marijuana; provide for the limited establishment of a Recreational Marijuana Establishment (RME) in an appropriate place and under strict conditions in accordance with Chapter 5 of the Acts of 2017; minimize the adverse impacts of a RME on adjacent properties, residential neighborhoods, schools, playgrounds and other land uses potentially incompatible with such a facility; regulate the siting, design, placement, security, safety, monitoring, modification, and removal of RMEs; and limit the overall number of RMEs in the community to what is essential to serve the public necessity.

B. Applicability.

1. The commercial cultivation, production, processing, assembly, packaging, wholesale sale, trade, or distribution of Marijuana for Recreational Use is prohibited unless permitted as a RME under this Section 8.10.

2. No RME shall be established except in compliance with the provisions of this Section 8.10.

3. Nothing in this Section 8.10 shall be construed to supersede federal and state laws governing the sale and distribution of narcotic drugs.

C. Definitions. As used in this Section, the following terms shall have the following meanings:

Host Community Agreement (HCA): A written agreement between an operator of a Recreational Marijuana Establishment (RME) and the Town of Medway that specifies measures an operator will take to anticipate, mitigate and address potential adverse impacts of the RME on the Town, neighborhood, or community at large, including but not limited to public safety services and infrastructure.

Marijuana: The same substance defined as "marijuana" under Chapter 5 of the Acts of 2017

Recreational Marijuana Establishment (RME): See definition in SECTION 2.

Recreational Marijuana Retailer: See definition in SECTION 2

Recreational Marijuana Social Consumption Establishment: See definition in SECTION 2.

D. Eligible Locations for Recreational Marijuana Establishments. Recreational Marijuana Establishments may be allowed by special permit from the Planning and Economic Development Board in the following zoning districts, provided the facility meets the requirements of this Section:

1. East Industrial *(renamed from Industrial I on 11-13-17)*

2. West Industrial *(renamed from Industrial III on 11-13-17)*

E. General Requirements and Conditions for all Recreational Marijuana Establishments

1. All non-exempt RMEs shall be contained within a permanent building or structure. No RME shall be located inside a building containing residential units or inside a movable or mobile structure such as a van, trailer, cargo container or truck.

2. A RME shall not be located in a building that contains any medical doctors' offices or the offices of any other professional practitioner authorized to prescribe the use of medical marijuana.

3. The hours of operation of RMEs shall be set by the Planning and Economic Development Board.

4. No RME shall be located on a lot within 500 linear feet of any lot of an existing public or private school serving students in grades K-12.

   a. The distance requirement may be reduced by the Planning and Economic Development Board if the applicant demonstrates that the RME would otherwise be effectively prohibited from locating within the municipality and that adequate security measures will be employed to prevent the diversion of medical marijuana to minors who are not qualifying patients.

   b. The distance between properties shall be calculated by direct measurement in a straight line without regard for intervening structures from the nearest property line of the land used as noted in E. 4. above to the nearest property line of the land on which the RME is to be located.

5. No smoking, burning or consumption of any product containing marijuana or marijuana-infused products shall be permitted on the premises of a RME.

6. A RME may not have a drive-through service.

F. Signage.

1. No permitted RME shall use any advertising material or graphics that are misleading, deceptive, or false, or designed to appeal to minors.

2. A RME shall not display on the exterior of the facility any advertisement for marijuana or any brand name.

3. Off-site signage or advertising in any form, including billboards shall not be allowed.

G. Contact Information. The RME shall provide the Medway Police Department, Building Inspector and the Planning and Economic Development Board with the names, telephone

numbers and email addresses of all management staff and key holders to whom the Town can provide notice if there are operating problems associated with the establishment.

H. Prohibition against Nuisances. No RME shall create a nuisance to abutters or to the surrounding area, or create any hazard, including but not limited to fire, explosion, fumes, gas, smoke, odors, obnoxious dust, vapors, offensive noise or vibration, flashes, glare, objectionable effluent or electrical interference, which may impair the normal use and peaceful enjoyment of any property, structure or dwelling in the area.

I. Openness of Premises.

1. Any and all cultivation, distribution, possession, storage, or display of recreational marijuana shall occur only within the restricted interior area of the RME.

2. The RME shall be designed and constructed such that no area or portion where marijuana is processed or stored is visible from the exterior of the building.

3. The front of the building which shall include the public entrance to the RME shall be fully visible from the public street or building frontage.

4. Marijuana and marijuana infused products shall not be displayed or clearly visible to a person from the exterior of the RME.

J. Special Permit Requirements.

1. RME shall only be allowed by special permit from the Planning and Economic Development Board in accordance with G.L. c. 40A, §9, subject to the following statements, regulations, requirements, conditions and limitations.

2. A RME is subject to site plan review by the Planning and Economic Development Board pursuant to Section 3.5, which shall be coordinated with the special permit process.

3. A special permit for a RME shall be limited to one or more of the following uses that shall be prescribed by the Planning and Economic Development Board:

   a. Cultivation of Marijuana (horticulture)

   b. Manufacturing, processing and packaging of marijuana for recreational use and the delivery and transport of marijuana and marijuana products to other RMEs, but not to consumers

   c. Independent testing laboratory

4. Recreational Marijuana Retailers and Recreational Marijuana Social Establishments are not allowed by right or special permit anywhere in Medway.

5. The RME special permit application shall include the following:

   a. The name and address of each owner of the facility;

   b. Copies of all required licenses and permits issued for the RME to the applicant by the Commonwealth of Massachusetts and any of its agencies;

c. Evidence of the Applicant's right to use the site of the RME for the RME, such as a deed or lease;

d. A statement under oath disclosing all of the applicant's owners, shareholders, partners, members, managers, directors, officers, or other similarly-situated individuals and entities and their addresses. If any of the above are entities rather than persons, the Applicant must disclose the identity of the owners of such entities until the disclosure contains the names of individuals;

e. A certified list of all parties in interest entitled to receive notice of the hearing for the special permit application, taken from the most recent tax list of the town and certified by the Town Assessor;

f. A detailed site plan that includes the following information:

i. A detailed floor plan of the premises of the proposed RME that identifies the square footage available and describes the functional areas of the facility including but not limited to sales, storage, cultivation, processing, food preparation, etc.

ii. Proposed security measures for the RME, including lighting, fencing, gates and alarms, etc., to ensure the safety of qualifying patients, their caregivers, and facility employees and to protect the premises from theft.

g. A copy of the policies/procedures for delivery service.

6. **Procedures.**

a. The special permit application and public hearing procedure for a RME shall be in accordance with Section 3.4 and G.L. c. 40A, § 9.

b. Mandatory Findings. The Planning and Economic Development Board shall not grant a special permit for a RME unless it finds that:

i. The RME is designed to minimize any adverse visual or economic impacts on abutters and other parties in interest, as defined in G.L. c. 40A, § 11;

ii. The RME demonstrates that it will meet all the permitting requirements of all applicable agencies within the Commonwealth of Massachusetts and will be in compliance with all applicable state laws and regulations; and

iii. The applicant has satisfied all of the conditions and requirements of this Section and Section 3.4 of this Zoning Bylaw.

7. **Conditions.** In granting a special permit for an RME under this Section 8.10, the Planning and Economic Development Board shall impose conditions, limitations, and safeguards that are reasonably appropriate to:

a. Improve site design, traffic flow, and public safety;

b. Protect water quality, air quality and significant environmental resources;

c. Preserve the character of the surrounding area.

These conditions, limitations, and safeguards may address but are not limited to:

d. Hours of operation

e. Landscaping and site amenities

K. Annual Reporting. Each RME permitted under this Section 8.10 shall as a condition of its special permit file an annual report with the Planning and Economic Development Board, the Building Inspector, the Health Agent, and the Police Chief no later than January 31st of each year, providing a copy of all current applicable state licenses for the RME and/or its owners and demonstrate continued compliance with the conditions of the special permit.

L. Duration of Special Permit. A special permit granted under this Section 8.10 shall remain exclusively with the applicant which shall be the owner or lessee of the premises described in the application. The special permit shall terminate automatically on the date the applicant alienates that title or leasehold interest in the premises.

M. Abandonment or Discontinuance of Use. A RME shall be required to remove all material, plants, equipment and other paraphernalia:

a. Prior to surrendering its state issued licenses or permits; or

b. Within six months of ceasing operations; whichever comes first.

N. Other Permits and Approvals. Receipt of a special permit from the Planning and Economic Development Board for a RME does not preclude an applicant from having to secure other required local permits from other Town boards or departments, including but not limited to the Board of Health, Conservation Commission, or the Department of Public Services.

O. Each RME permitted under this Zoning Bylaw shall enter into a Host Community Agreement (HCA) with the Town of Medway.

And by amending Section 5.4, Schedule of Uses, by revising and adding the following text in Table 1 – Schedule of Uses under Business Uses and Industrial Uses as shown:

NOTE – Proposed new text is highlighted in grey and proposed deleted text is shown with a ~~strike through.~~

	Zoning District									
	AR-I	**AR-II**	**VR**	**CB**	**VC**	**NC**	**BI**	**EI**	**ER**	**WI**
D. BUSINESS USES										
Recreational Marijuana Retailer	N	N	N	N	N	N	N	N	N	N
Recreational Marijuana Social Consumption Establishment	N	N	N	N	N	N	N	N	N	N
F. INDUSTRIAL AND RELATED USES										
Recreational Marijuana Establishment	N	N	N	N	N	N	~~PB~~ N	PB	N	PB

NOTE – PB means the use may be allowed by special permit from the Planning and Economic Development Board. N means the use is prohibited.

Or act in any manner relating thereto.

PLANNING AND ECONOMIC DEVELOPMENT BOARD

BOARD OF SELECTMEN RECOMMENDATION: **Approve**

FINANCE COMMITTEE RECOMMENDATION: **Approve**

ARTICLE 24: (Amend Zoning Bylaw: Site Plan Review)
To see if the Town will vote to amend portions of Section 3.5 Site Plan Review of the Zoning Bylaw as follows: Deleted text is shown with a ~~strikethrough;~~ new text is shown as underlined.

3.5 SITE PLAN REVIEW

3.5.1 Purposes

Site plan review is a means of managing the aesthetics and environmental impacts of land use by the regulation of permitted uses, not their prohibition. Its purpose is to:

- provide a standard process to review proposed development and redevelopment projects for compliance with the Medway Zoning Bylaw
- assure protection of the public interest consistent with a reasonable use of the site for the purposes permitted in the district; and
- promote and encourage desired community characteristics as expressed in the *Master Plan* and *Design Review Guidelines*

3.5.2 Requirements

A. No building permit shall be issued for any use, site, or building alteration, or other improvement that is subject to this Section 3.5 unless an application for site plan review has been prepared in accordance with the requirements herein and unless such application has been approved by the Planning and Economic Development Board (hereinafter referred to in this Section as the Board) or its designee in the instance of administrative site plan review.

B. Unless specifically authorized by the terms of the site plan review decision, a final certificate of occupancy shall not be issued until the project has been completed in accordance with the approved and endorsed site plan and the applicant has complied with or satisfied all conditions of the site plan review decision.

C. Any work done in deviation from an approved site plan shall be a violation of this Bylaw unless such deviation is approved in writing by the Board or its designee or is determined by the Building Inspector to be an insubstantial change.

3.5.3. Applicability

A. Site plan review shall apply to the following:

1. **Major Site Plan Review**:
   a. New construction or any alteration, reconstruction, renovation, and/or change in use ~~or renovation~~ of any multi-family, commercial, industrial, institutional, or municipal building or use which involves one or more of the following:
      i. the addition of 2,500 square feet or more of gross floor area; or
      ii. the addition of ~~fifteen~~ twenty or more new parking spaces~~; or~~

Bk 37679 Pg449 #23627
03-16-2020 @ 12:40p

TOWN OF MEDWAY

COMMONWEALTH OF MASSACHUSETTS

PLANNING AND ECONOMIC DEVELOPMENT BOARD

Medway Town Hall
155 Village Street
Medway, MA 02053
Phone (508) 533-3291
Fax (508) 321-4987
Email: planningboard
@townofmedway.org
www.townofmedway.org

Board Members

Andy Rodenhiser, Chair
Robert Tucker, Vice Chair
Thomas Gay, Clerk
Matthew Hayes, P.E., Member
Richard Di Iulio, Member

Staff

Susan Affleck-Childs, Planning and Economic Development Coordinator

Adult Recreational Marijuana Special Permit, Groundwater Protection Special Permit, and Site Plan Decision

NeoOrganics, LLC - 4 Marc Road

APPROVED with Conditions

Decision Date: January 28, 2020

Name/Address of Applicants:

Neo Organics LLC
365 Boston Post Road, # 184
Sudbury, MA 01776

NEK, LLC
20533 SE Evergreen Highway
Camas, WA 98607

Name/Address of Property Owner:

NEK, LLC
20533 SE Evergreen Highway
Camas, WA 98607

Location: 4 Marc Road

Assessors' Reference: 32 – 026

Zoning District: East Industrial

Site Plan: *Permit Site Plan for 4 Marc Road, Neo Cultivation and Manufacturing,* dated August 6, 2019, last revised December 13, 2019, prepared by DGT Associates Surveying and Engineering of Framingham, MA

RECEIVED
JAN 30 2020
TOWN CLERK

36

NEO Manufacturing Positive Impact Plan:

Within the goal of inclusion of under-represented groups in the Industry, NEO Manufacturing has developed a plan for how it will positively impact communities disproportionately impacted by high rates of arrest and incarceration for drug offences. NEO's focus will be to implement programs that will reduce barriers to entry in the commercial adult-use cannabis industry, provide mentoring and professional services for affected individuals from neighboring areas of disproportionate impact as defined by the Commission and promote sustainable, socially and economically reparative practices in the cannabis industry in Massachusetts.

NEO Manufacturing Positive Impact Goals:
NEO's Positive Impact Plan will target past or present residents of the geographic areas of disproportionate impact as defined by the Commission. NEO values its neighboring communities and will target the disproportionately impacted areas of Walpole and Mansfield, specifically past and present residents directly or indirectly affected by disproportionate incarceration for drug offences. These communities are within 30 minutes of NEO's Manufacturing Facility located in Medway. NEO intends to directly affect 50-100 individuals annually through a combination of direct employment at the Company's Facility, its developed mentorship programs and seminars on criminal record expungement.

NEO Manufacturing Positive Impact Programs:

Workforce Diversity and Inclusion:
In alignment with the goals and intentions of NEO's Diversity Plan, the first goal of its Positive Impact Plan will seek to reduce barriers to entry in the commercial adult-use cannabis industry by expanding its diversity recruiting efforts and targeting these specific communities. NEO's Manufacturing Facility will hire a total of 25 full time equivalent employees for the operation of its facility. It is the Company goal to hire 20% of its workforce from disproportionately impacted areas as defined by the Commission. To reach this goal, the company will focus a large portion of its recruiting efforts in Walpole, by hosting annual job fairs and annual advertising locally. Once provisionally licensed, NEO will begin its recruiting and hiring processes. 90 days before receiving the facility's Certificate of Occupancy NEO will begin advertising available positions with the hiring/interviewing process beginning 30 days prior to receiving the Certificate of Occupancy.

Mentorship and Training Programs:
NEO has developed several outreach job skills training programs that will be hosted by the Company once per quarter, or four times annually. NEO understands that sometimes companies are hesitant to hire an individual with a criminal record which creates a challenging, and often difficult, job search for an ex-offender. NEO's mentorship programs will help ex-offenders prepare for interviews, as well as provide resources, training, and recommendations to individuals and companies who believe people are entitled to a second chance. The intention of these programs is to assist the disproportionately impacted members directly affected by incarceration of Walpole and Mansfield gain the necessary soft skills to obtain employment and prepare them to be job ready. To many employers, these skills are just as or more important than work related skills. They are good indicators of how successful a prospective employee will be on the job. These modules will include topics such as resume writing, cover letters, interviewing, how to search for jobs and networking.

NEO intends to have its mentorship and training programs will be advertised 90 days prior to its facility receiving its Certificate of Occupancy with the first mentorship training course occurring approximately 60 days prior. The first 4 mentorship classes that NEO will offer will be:

1. Resume Writing
2. Interviewing Skills
3. Job prospecting- where to find opportunities and listings
4. Individual SWOT (Strengths, Weaknesses, Opportunities and Threats) analysis- and how to market one's skills to a potential employer.

Criminal Record Expungement Seminar:
NEO understands that a criminal record can create difficult consequences for an individual. Employers and landlords commonly ask job applicants and rental applicants whether they have ever been convicted of a criminal offense. With the assistance of NEO's legal team, the Company will conduct at minimum one seminar annually targeting affected present and past residents of Walpole and Mansfield and any other member of a disproportionately impacted area to participate in a free seminar on the process of having a criminal record expunged. These seminars will detail general expungement information, record clearing basics and information specific to the process in the State of Massachusetts.

Positive Impact Plan Measurements:
In order to effectively track the success of its Positive Impact Programs, NEO will implement Program Tracking and Measurements metrics that will be analyzed every six months. These metrics will include both quantitative and qualitative data analysis.

Quantitative Metric Analysis:

1. The number of total positions created and filled by the company within the first year of licensed operation.
2. The number of past and present residents of disproportionately impacted areas who were hired.
3. The number of past and present residents of disproportionately impacted areas who were retained.
4. The number of past and present residents of disproportionately impacted areas who were promoted.
5. The number of participants from disproportionately impacted areas that attended NEO's Mentorship and Training Programs.
6. The number of participants from disproportionately impacted areas that attended NEO's Criminal Record Expungement Seminars.

Qualitative Metric Analysis:

1. Employee/Management teamwork analysis.
3. Employee Retention Analysis.
4. Reception of Mentorship and Training topics.
5. Reception of the Criminal Record Expungement Seminar.

Through a cross analysis of both the quantitative and qualitative metrics, NEO Manufacturing will determine its Positive Impact Program efficacy and make adjustments to ensure that minimum goals are attained and preferably exceeded. All progress and success of NEO will be documented one year from provisional licensure, and each year thereafter. All the advertising, branding market and sponsorship practices of NEO, will adhere to the requirements set forth in 935.CMR 500.105 (4). All programs implemented by NEO will not violate the Commission's regulation with the respects to limitations on ownerships or control or other applicable State laws.

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

William Francis Galvin
Secretary of the
Commonwealth

March 13, 2019

TO WHOM IT MAY CONCERN:

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

NEO MANUFACTURING MA LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **May 30, 2018**.

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

I also certify that the names of all managers listed in the most recent filing are: **NEO ALTERNATIVES LLC**

I further certify that the name of persons authorized to act with respect to real property instruments listed in the most recent filings are: **NEO ALTERNATIVES LLC**

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

Processed By:sam

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

mass.gov/dor

Letter ID: L1446229376
Notice Date: March 18, 2019
Case ID: 0-000-737-035

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000027

ADAM PATTI
NEO MANUFACTURING MA
365 BOSTON POST RD # 184
SUDBURY MA 01776-3023

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, NEO MANUFACTURING MA 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

OPERATING AGREEMENT OF

NEO MANUFACTURING MA LLC

OPERATING AGREEMENT of **NEO MANUFACTURING MA LLC** (the "**Company**") effective as of the 1st day of March, 2019 executed by NEO ALTERNATIVES LLC, a Delaware limited liability company, as the Manager of the Company (the "Manager"), and NEO ORGANICS MA LLC, a Delaware limited liability company, as the sole member of the Company (the "Member").

ARTICLE 1 - DEFINED TERMS

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

(a) ""**Act**" means the Delaware Limited Liability Company Act, as the same may be amended from time to time (6. DEL. C. §18, 101, *et seq.*).

(b) "**Certificate**" means the Certificate of Formation of the Company as initially filed on May 18, 2018, as amended on January 23, 2019, and any and all amendments thereto and restatements thereof filed on behalf of the Company pursuant to the Act.

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

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

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

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

ARTICLE 2 - FORMATION AND TERM

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

restatements thereof.

Section 2.2 Term. The term of the Company commenced on May 18, 2018, which is the date the initial Certificate was filed with the Delaware Department of State, and shall continue until the Company is dissolved in accordance with the provisions of this Agreement and the Act.

Section 2.3 Registered Agent and Office. The Company's registered agent and office shall be Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19801. At any time, the Manager may designate another registered agent and/or registered office.

Section 2.4 Principal Place of Business. The principal place of business of the Company shall be located at 365 Boston Post Road, #184, Sudbury, MA 01776. At any time, the Manager may change the location of the Company's principal place of business.

Section 2.5 Purpose. The purpose of the Company shall be to engage in the manufacturing and sale of cannabis products, and any other business permitted by the Act.

ARTICLE 3 - MEMBER

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

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

ARTICLE 4 - CAPITAL ACCOUNTS, CONTRIBUTIONS AND ALLOCATIONS

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

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

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

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

ARTICLE 5 - MANAGEMENT

Section 5.1 Management of the Company. The Company shall be managed exclusively by the Manager. The Manager shall have full, sole and exclusive and complete discretion, right, power, and authority to manage, control and make all decisions affecting the business and affairs of the Company and to do or cause to be done any and all acts, at the expense of the Company on the terms provided herein, deemed by the Manager to be necessary or appropriate to effectuate the business, purposes and objectives of the Company as set forth in this Agreement. The Manager may amend this Agreement without the consent of any Member. A Manager may resign by giving at least five (5) days written notice to all of the Members. A Manager may be removed by the Member by an instrument in writing.

Section 5.2. Additional Members. The Manager is authorized to admit any Person as an additional Member of the Company

Section 5.3 Reliance by Third Parties. Any Person dealing with the Company or a Manager may rely upon a certificate signed by the Manager as to (a) the identity of a Manager or any Member; (b) the existence or non-existence of any fact or facts which constitute a condition precedent to acts by a Manager, or which are germane to the affairs of the Company in any other manner; (c) the Persons who are authorized to execute and deliver any instrument or document of or on behalf of the Company; or (d) any act or failure to act by the Company or as to any other matter whatsoever involving a Manager, the Company or any Member.

ARTICLE 6 - BOOKS AND RECORDS

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

ARTICLE 7 - TAX MATTERS

Section 7.1 Taxation as a Partnership. The Company shall be operated in such a manner that it will be taxed as a partnership for federal and state income tax purposes, provided that the Manager shall have the power to make or revoke all elections provided for under the Code and applicable state income tax laws, including those with respect to the application of the provisions of Subchapter K of the Code.

Section 7.2 Tax Matters Representative. The Manager shall act as "**Partnership Representative**" of the Company for purposes of Section 6231(a)(7) of the Code and shall have the power to manage and control, on behalf of the Company, any administrative proceeding at the Company level with the Internal Revenue Service relating to the determination of any item of Company income, gain, loss, deduction or credit for Federal income tax purposes. The Tax Matters Representative may, make or revoke, on behalf of the Company, an election in accordance with Section 754 of the Code, so as to adjust the basis of Company property in the case of a distribution of property within the meaning of Section 734 of the Code, and in the case of a transfer of an Interest within the meaning of Section 743 of the Code.

ARTICLE 8 - DISSOLUTION, LIQUIDATION AND TERMINATION

Section 8.1 Events Causing Dissolution. The Company shall be dissolved and its affairs

shall be wound up upon the occurrence of any of the following events: (a) upon the election of the Member; (b) the entry of a decree of judicial dissolution under the Act; or (d) the sale or disposition of all or substantially all of the property of the Company.

Section 8.2 Liquidation. Upon dissolution of the Company, the Manager shall carry out the winding up of the Company and shall immediately commence to wind up the Company's affairs; provided, however, that a reasonable time shall be allowed for the orderly liquidation of the assets of the Company and the satisfaction of liabilities to creditors so as to enable the Members to minimize the normal losses attendant upon a liquidation. The Company shall terminate when all of the assets of the Company, after payment of or due provision for all debts, liabilities and obligations of the Company, have been distributed to the Members in the manner provided for in this Article and the Certificate has been cancelled in the manner required by the Act.

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

MEMBER:

NEO ORGANICS MA LLC

By: **NEO ALTERNATIVES LLC**
Its Manager

By: Adam S. Patti, Manager

MANAGER:

NEO ALTERNATIVES LLC

By: Adam S. Patti, Manager

FOREIGN LIMITED LIABILITY COMPANY
CERTIFICATE OF AMENDMENT

NEO ALTERNATIVE FUNDS GP LLC

Pursuant to Chapter 156C, Section 52 of the Laws of the Commonwealth of Massachusetts (hereinafter the "Act") the undersigned hereby certifies as follows:

1. **Name.**

   a. The name of the limited liability company is NEO Alternative Funds GP LLC.

   b. The name of the limited liability company *as amended*, is: NEO Manufacturing MA LLC (hereinafter "LLC")

2. **Office.**

   a. The street address of the Principal Office of the LLC is:
   365 Boston Post Road #184, Sudbury, MA 01776.

   b. The location in Massachusetts where records will be maintained is:
   365 Boston Post Road #184, Sudbury, MA 01776.

3. **Business of the LLC.** The general character of the business of the LLC shall be the initial purpose of submitting applications with all applicable Massachusetts regulatory agencies to obtain authorization to engage in the manufacturing and sale of cannabis products, and any other business in which a Massachusetts limited liability company is authorized to engage. The LLC will not engage in any activity requiring the approval and endorsement of the Cannabis Control Commission until such authorizations have been received.

4. **Date of Dissolution.** The LLC has no specific date of dissolution.

5. **Resident Agent.** As of the date hereof, the following person has been appointed and has agreed to act as resident agent of the LLC:

   Adam S. Patti, 365 Boston Post Road #184, Sudbury, MA 01776

6. **Managers.** As of the date hereof, the following persons have been appointed and has agreed to act as Manager of the LLC:

   NEO Alternatives LLC, 365 Boston Post Road #184, Sudbury, MA 01776

7. **Execution of Documents.** The Managers are authorized to execute any document to be filed with the office of the Secretary of State of the Commonwealth of Massachusetts, to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property, whether to be recorded with a registry of deeds or a district office of the Land Court, and to execute, acknowledge, deliver and file or record any instrument, document or certificate, which execution, acknowledgment, delivery, filing and/or recording shall bind the LLC, without further action.

8. **Amendments to the Registration.**

   Section 1(b) - changing the name of the LLC
   Section 2 - change of address
   Section 3 - amending the business of the LLC
   Section 6 - changing Manager
   Section 7 – changing authorized signatory

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Amendment as of February 12, 2019.

Manager:

NEO ALTERNATIVES LLC

Adam S. Patti, its Manager

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "NEO MANUFACTURING MA LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRTEENTH DAY OF FEBRUARY, A.D. 2019.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "NEO MANUFACTURING MA LLC" WAS FORMED ON THE EIGHTEENTH DAY OF MAY, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.

Jeffrey W. Bullock, Secretary of State

6891778 8300

SR# 20190984003

Authentication: 202255176

Date: 02-13-19

You may verify this certificate online at corp.delaware.gov/authver.shtml

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "NEO ALTERNATIVE FUNDS GP LLC", CHANGING ITS NAME FROM "NEO ALTERNATIVE FUNDS GP LLC" TO "NEO MANUFACTURING MA LLC", FILED IN THIS OFFICE ON THE TWENTY-THIRD DAY OF JANUARY, A.D. 2019, AT 3:31 O`CLOCK P.M.

Jeffrey W. Bullock, Secretary of State

SECRETARY'S OFFICE DELAWARE 1897

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SR# 20190448068

Authentication: 202136716
Date: 01-24-19

You may verify this certificate online at corp.delaware.gov/authver.shtml

STATE *of* DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE *of* AMENDMENT

The undersigned, an authorized natural person, for the purpose of amending a limited liability company, under the provisions and subject to the requirements of the State of Delaware (particularly Chapter 18, Title 6 of the Delaware Code and the acts amendatory thereof and supplemental thereto, and known, identified, and referred to as the "Delaware Limited Liability Company Act"), hereby certifies that:

FIRST: The name of the limited liability company (hereinafter called the "Limited Liability Company") is **NEO Alternative Funds GP LLC**.

SECOND: The Certificate of Formation of the Limited Liability Company is hereby amended as follows:

The amended name of the Limited Liability Company is **NEO Manufacturing MA LLC**.

In Witness Whereof, the undersigned has executed this Certificate of Amendment this 22nd day of January, 2019.

By: _____
Adam S. Patti, Authorized Person

3122429.v1

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:31 PM 01/23/2019
FILED 03:31 PM 01/23/2019
SR 20190448068 - File Number 6891778

THE COMMONWEALTH OF MASSACHUSETTS

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

February 14, 2019 12:06 PM

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

LIABILITY INSURANCE:
935 CMR 500) A Marijuana Establishment shall obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than $5,000 per occurrence. NEO intends to secure a policy to fulfill this requirement prior to beginning build out of its facilities.

NEO MANUFACTURING BUSINESS PLAN
Confidential

Address:
4 Marc RD
MEDWAY, MA 02053

EXECUTIVE SUMMARY:

This plan provides detailed information on operations, strategies, products, ownership and financials necessary for the establishment, licensing and operation of NEO Manufacturing LLC, a subsidiary of NEO Organics LLC. NEO Manufacturing is an established, well situated limited liability company that intends to enter the Massachusetts adult use cannabis market and secure a Manufacturing License for its planned manufacturing facility, located in Medway, MA and a corresponding Transporter License.

As the Massachusetts adult use cannabis market slowly unfolds, high demand and low supply have created a need for a low cost, high quality cannabis offering within the marketplace. The robust adult use cannabis market in Massachusetts is expected to reach $1.4 billion by 2025. NEO Manufacturing plans on filing this void by capitalizing on the creation and implementation of highly efficient business practices within a highly systematized and sustainable manufacturing establishment.

This proposed facility for manufacturing of its proposed product line up. NEO Manufacturing will fabricate a variety of quality cannabis products for distribution as wholesale concentrates, vape pen cartridges, edibles and pre-rolls to other licensed adult use retail businesses in Massachusetts.

NEO Manufacturing is directed by Chad Blair (CFO), Adam Patti (CMO) and Jaime Lewis (CEO). The synergy of this accomplished ownership team positions NEO Manufacturing to build a longstanding, value driven, cannabis brand and secure its market share within the nascent industry. Each bring unique qualities, talents and experience allowing for the fusion of a visionary entrepreneur, the sage financial and best practices of a 10 year veteran of the regulated, legal cannabis industry. This executive leadership group will hire and train a well-qualified management staff to execute its benchmarks.

Based on the current demand and prices in the Massachusetts adult use market, NEO Manufacturing has the potential to generate $7,976,675 in revenue within the first 12 months of operation. With the implementation of an exceptional management team and the fine-tuning of incorporated technologies, a revenue growth of 200% can be expected to greatly improve those projections in the second fiscal year of manufacturing.

Key strategic factors to attain NEO Manufacturing's success include:

- Construction of a highly sustainable facility. Utilizing solar power and energy efficient mechanical options to minimize the carbon footprint of operations and production costs.
- Implementation of automated systems to increase production efficiencies and minimize operator error.

- Execution of a quality cannabis product with a value-pricing marketing strategy.

OBJECTIVES:

- Integrate NEO Manufacturing cannabis concentrate and edible products into the Massachusetts adult use market and allow NEO to expand access to safe, convenient, high quality marijuana for adults over the age of 21 in the Commonwealth.
- Establish a sustainable and automated manufacturing facility in Medway, MA to maximize production and minimize cost and carbon footprint allowing the company to achieve standards of excellence in manufacturing that would result in the awarding of a leadership rating as described in 935 CMR 500.040.
- Brand NEO cannabis products as premium quality products at a value price to the non-connoisseur consumer and ensure the presence of full spectrum cannabinoid profiles and genetic diversity on the MA adult use market.
- Practice a good neighbor policy at its manufacturing facility provide multiple opportunities to contribute and expand the local economy.
- Be a responsible vendor in the adult use market focused on safe use.
- .

MISSION STATEMENT:

NEO will build and establish a sustainable, state of the art manufacturing facility that will fabricate quality cannabis products intended for distribution to the Massachusetts adult use market.

- NEO will provide the adult use retail marijuana establishment licensees in Massachusetts quality, cost effective edible and concentrate options for the non-connoisseur consumer and secure its market share with a value-based product offering.
- NEO's sustainable facility and use of automated technology will increase efficient production while simultaneously minimizing its impact on its host community and the environment, allowing NEO Manufacturing the ability to fill a void in the need for an economical product option in the Massachusetts adult use market.
- NEO will imbue its marketing and sales messaging with consumer safety.

STRATEGY STATEMENT:

- NEO's seasoned ownership group fuses a collective cannabis business expertise and passion in compliance with all laws and regulations provided by the Cannabis Control Commission. This powerful ownership group has extensive experience in start-ups, financing and best practices within the regulated cannabis markets to create and maintain standards of professionalism under the guidance of the Commission.
- Focused short-term benchmarks coupled with long term, well defined goals have positioned NEO for longevity. NEO's plan allows for flexibility and growth.
- Strong distribution goals to service a value-based niche of the non-connoisseur MA adult use market and the implementation and utilization of an internal distribution model to achieve these goals.
- NEO is a well-funded and capitalized entity with significant access to additional resources as needed.
- Extensive base of qualified external vendors and professionals to work with to attain NEO's facility sustainability, good neighbor and automation goals.

COMPANY SUMMARY:

NEO Manufacturing LLC is a subsidiary of NEO Organics LLC and will be located at 4 Marc Rd, Medway, MA, 02053 where the company has secured a long-term lease. This location meets all local zoning requirements for the proposed cultivation usage and a special permit application and host community agreement are pending approval.

The primary ownership partners in this plan are responsible for all phases of business and product development with a primary emphasis on bringing efficiency and the latest automation and sustainability technologies into the business model, facility design and construction. With NEO's experience rooted in start-up operations and financing, streamlining management and production processes and best practices of existing regulated cannabis markets, NEO will successfully establish a quality, value-based cannabis brand for licensed adult use retail marijuana establishments in MA while in full compliance with all the laws and regulations provided by the Commission.

Jaime Lewis, CEO: Jaime Lewis has over a decade of experience leading medical and adult use marijuana dispensary operations, cultivation design and operations, and managing the production of marijuana-infused products. Prior to joining NEO Jaime was the Chief Operating Officer of a large Colorado medical dispensary operation, where she was responsible for operations, compliance, strategic planning, business development, governmental affairs and community relations. She was also the COO of an operations in the State of Massachusetts. She is the founder of Mountain Medicine, an infused cannabis product manufacturer and distributor to Colorado dispensaries and Coldwater Consulting, an active cannabis business consulting firm.

Jaime was a former board member chair of the National Cannabis Industry Association, where she served as a national spokesperson for the regulated cannabis industry. As a NCIA board member and a founder of the Cannabis Business Alliance, Lewis has effectively supported business involvement and trade group engagement. In an effort to ensure NCIA's federal representation, Lewis worked to strengthen its lobbying efforts. Lewis launched NCIA's infused Products Council and was instrumental in facilitating a collaboration with the Council on Responsible Cannabis Regulation on a new Packaging and Labeling Standards Committee. She has provided testimony and guidance to legislators and regulators across the U.S., supporting the creation of responsible regulations.

Jaime has a proven track record of success in launching and operating new cannabis businesses within a compliant, regulatory framework. Her decade plus experience in the Colorado market has provided Jaime with a solid knowledge base of industry best practices, community outreach, responsible vending and consumer safety messaging. Under Ms Lewis' direction, NEO Manufacturing is positioned to be a leader within the industry. Jaime will lead NEO in designing its facility, authoring its standard operations procedures, hiring and training the best qualified candidates to fulfill the company's missions and objectives.

Chad Blair, CFO: Chad Blair has over two decades of experience facilitating successful business development, sales and marketing strategies, streamlining operation efficiencies and organization change management. Chad is an entrepreneurial visionary with a primary focus on company growth and finance. Chad earned an MBA from Babson College with a concentration in Marketing and Entrepreneurship.

Before co-founding NEO Manufacturing, Chad owned and operated several companies in MA where he was responsible for creating operational efficiency, increasing market share and overall company revenues. He successfully led Envision Realty LLC in Harvard, MA and CSB Consulting, a consulting firm responsible for increasing operational efficiencies and change management for its corporate clients in the greater Boston area. Mr. Blair has a proven track record of success in growing businesses in the Manufacturing sector, increasing business at FCG Inc 600% in a six-year period and augmenting revenues at RT Engineering from $3.5MM in sales to over $15MM.

Neo Manufacturing will benefit from Chad's adept ability to assess operational efficiencies, his knowledge of manufacturing automation systems and his proficiency in generating company growth. Chad will foster the effectiveness of NEO's productivity and plot a successful company revenue growth path.

Adam Patti, CMO: Adam Patti is a leader in the Investment Management industry. Most recently, Adam was founder, Chairman and CEO of IndexIQ, a leading alternative investment

manager in the Exchange-Traded Finds (ETF) industry. Adam was the architect of IndexIQ's award winning product line covering hedge fund, natural resource and real estate strategies, and built the firm to nearly $5 Billion in assets under management. IndexIQ was sold to New York Life in 2015. Over the following 3 years, Adam facilitated New York Life's global ETF roll-out and integrated IndexIQ into the broader organization. While at IndexIQ, Adam served as Board Chairman for the company and for its three Fund Trusts covering mutual funds, index-based ETFs and active ETFs.

Prior to this, Adam held a series of executive rolls at Time Warner including Associate Publisher and Head of Marketing Strategy and Brand Development where he led sales, marketing, business development for a portfolio of print and digital properties. Previously Adam was an investment banker at Salomon Smith Barney, and President and Founder of ThreadeXchange, a venture-backed supply chain software company.

Adam is frequently featured in the media and has won numerous awards as an expert in alternative investments. He holds an MBA from Northwestern University - Kellogg Graduate School of Management with a triple major in Finance, Marketing and Entrepreneurship, and a B.S. in Finance from University at Albany. Adam is the visionary behind the creation of the NEO brand.

Executive NEO Positions:
The VP of Branding: The VP of Branding will create NEO's marketing and advertising strategies and create compelling brand stories. The VP of Branding will brand elements and insure all marketing collateral is in line with the brand strategy and monitor market trends, research potential, new consumer markets and competitors' activities to identify additional opportunities and growth for the NEO brand.

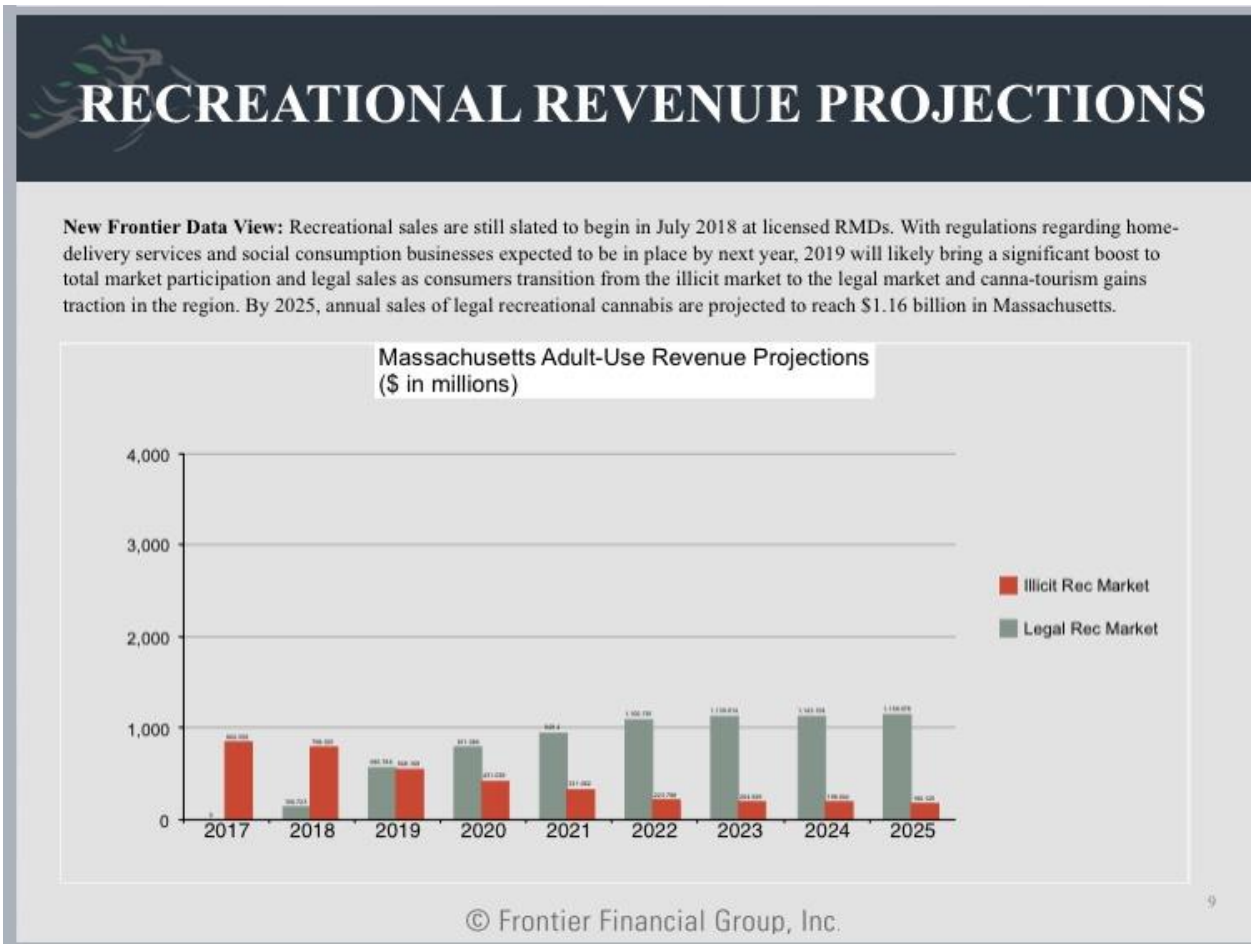
Financial Controller: The controller position is accountable for the accounting operations of the company, to include the production of periodic financial reports, maintenance of an adequate system of accounting records, and a comprehensive set of controls and budgets designed to mitigate risk, enhance the accuracy of the NEO's reported financial results.

Marketing Director: The Marketing Director will work with the VP of Branding to develop and implement the NEO brand strategy. They will be directly responsible for developing the marketing strategy for new and existing products and executing the marketing strategy - including campaigns, events, digital marketing, and PR.

Admin/HR: The admin position at NEO will be responsible for supporting the organization in a variety of ways including bookkeeping, communications, scheduling, data entry and secretarial services. The Admin position will also oversee recruiting and implementing NEO's Diversity Plan, employee screening and interviewing and handling employee relations, payroll and benefits.

INDUSTRY AND MARKET SUMMARY:

NEO's target market consists of all licensed adult use retail marijuana establishments. NEO Manufacturing intends to supply retail marijuana establishments with high quality edible and concentrate products to address the demand of the over 21, adult use cannabis market within the state. As of March 7, 2019 there were a total of 114 adult use retail license submissions to the Cannabis Control Commission and with no planned cap on license numbers, this number is expected to grow significantly in the next year. According to statewide projections made by New Frontier Financial Group, annual sales of legal recreational cannabis in Massachusetts are expected to reach $1.6 billion by the year 2025.



Market Segmentation: The Marijuana Business Factbook 2018, estimates that there are 900,000 to 1.1 million native cannabis customers in the state of Massachusetts, without contemplating the number of cannabis tourists expected. Statistics provided by BDS analytics show that market segmentation by product category by sales in dollars in the national recreational cannabis markets are:

- Concentrates 27%
- Edibles 12%

NEO Manufacturing will derive its market share by embracing the demand for affordable cannabis by offering value-based edible and concentrate products to differentiate itself from the higher priced connoisseur grade, craft competitors in these segments of the cannabis market.

OPERATION, MARKETING AND DISTRIBUTION PLAN:

Products and Product Development:
NEO Manufacturing will produce a selection of quality cannabis edibles, topicals and concentrates that contemplate a favorable consumer experience at a no-frills price. NEO Manufacturing will benefit from a consistent source of full spectrum cannabinoid profiles and genetic diversity in the Massachusetts adult use market to produce these products.

NEO Manufacturing Facility Summary:
NEO Manufacturing will operate its facility from with a long lease in a building located at 4 Marc Rd, Medway, MA, meeting all the criteria for the issuance of a marijuana establishment special permit under the City of Medway Zoning Ordinance NEO will utilize 8,800 sq ft for manufacturing at the facility. The facility will be open and in operation 7 days a week. All manufacturing activities will take place within limited access areas in the facility. Operations will be conducted in a secure, responsible and sustainable manner in strict compliance with the regulations set forth by the Commission in 935 CMR 500.000: Adult Use of Marijuana.

Manufacturing Facility Design:
NEO will design a sustainable facility incorporating energy, water and other material efficient components to conserve resources, cut costs and minimize its carbon footprint. NEO is contemplating efficiencies that include solar power, high efficiency HVAC systems, energy efficient commercial kitchen appliances and automated packaging systems. The efficiencies are crucial to NEO's competitive edge within the Industry.

NEO's facility will practice exemplary good neighbor policies. NEO has successfully executed its Host Community Agreement without opposition and plans to exceed all noise and odor mitigation requirements. The company has applied for its marijuana establishment special permit, has submitted its proposed site plan to the City of Medway Zoning and is awaiting a provisional status to begin build out.

NEO's good neighbor efforts will continue in the development and execution of a comprehensive security plan that will satisfy and exceed rule 935 CMR 500.110 (1)(o). The safety and security of the NEO facility, the marijuana establishment agents, products and equipment contained within, customers and general goodwill of the Commonwealth is a top priority of NEO. All security policy, procedures, plans and equipment relating to security will be provided by licensed and professional contractors. Furthermore, the team at NEO will aim to

establish an open and working relationship with local law enforcement and fire services prior to establishing their need to share security plans and procedures.

NEO's Security Plan:
NEO considers overall security as one of the most vital aspects of the overall operation. The security plan developed by NEO aims to achieve the following assurances:

- Physical employee security
- Reasonable workplace safety
- Building protection and security
- Protection of company assets, data, networks, software and equipment
- Diversion protection and prevention
- Age and identity verification policies
- Anti-loitering policies
- Unauthorized access prevention and secured access to all entries
- Limited access areas
- Limited opening secure doors for minimum amount of time necessary to perform task
- Barrier and security feature function check
- Badge and key accountability policy
- Access control system policy
- Sufficient perimeter lighting policy
- Out of plain sight policy
- Product lockdown following diversion discovery policy
- Assessing NEO property for additional safeguards
- Transparency with local enforcement agencies
- Security camera placement
- DVR operation, maintenance and back up

Standard Operating Policies and Procedures:
To create a consistent, compliant practice and uniform cultivation and production model NEO will mandate that all processes and procedures be executed according to its crafted Standard Operating Procedure Manual. Jaime Lewis will author this document based on her 10 plus years of experience with industry best practices established in other states with regulated marijuana. The development of core policies and procedures will ensure the ongoing success of NEO Manufacturing and enable the team to provide consistent, high quality, tested edible and concentrate marijuana products within the requirements of the Commission's regulations. The Standard Operating Procedure Manual will detail policies and procedures for:

- Health and sanitation standards
- Contaminant mitigation
- Safe extraction methods
- Employee safety, illness and injury prevention

- Trim and Flower processing
- Record keeping
- Seed to sale tracking- METRC and Cannabis 365
- Inventory
- Batch creation
- Prevention of diversion
- Waste and proper disposal
- Restricting access to age 21 and older
- Facility security plan
- Product storage procedures
- Secured record storage
- Access control system
- Limited access areas
- Transportation
- Quality control
- Edible and concentrate samples and testing
- Packaging and labeling of product
- Personnel policies
- Employee and agent registration
- Maintaining financial records
- Diversity plan
- Employee job descriptions, requirements, qualifications and training
- Responsible Vendor certification
- Marketing and sales process
- Emergency procedures
- On site behaviors
- Visitor protocols
- Product safety education
- Prohibited items and activities
- DVR maintenance
- Inspection preparedness
- Enforcement interactions
- General maintenance and repair protocols
- Food product handling

Personnel and Management Summary:
NEO understands that its most powerful tool in achieving mission success is reliant on its ability to recruit, train and retain a high performing workforce. All hiring and staffing decisions reflect NEO's employment values as an equal opportunity employer dedicated to a policy of nondiscrimination in employment on the basis of race, religion, creed, color, gender, sexual orientation, national origin, veteran status, age, disability and any other status protected by law.

NEO's Diversity Plan:
Special efforts will be made to exceed the expectations of 935 CMR 500.101(1)(c)(7)(k) through implementation of "a diversity plan which will promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of the Marijuana Establishment." NEO's Diversity Plan will:

- Identify strategies to develop an inclusive pipeline of potential applicants.
- Provide training and learning opportunities for employees to maximize their potential and ensure continuing development of their knowledge, skills and abilities.
- Create a diverse and inclusive workplace and culture.

All agents and employees of NEO will be vetted with required background checks and registered with the Commission per 935 CMR 500.030. All written staffing procedures, policies and practices adopted and enforced for NEO Manufacturing are designed to be compliant under all applicable laws. NEO will craft a core training curriculum which will educate employees on all aspects of the Standard Operating Procedures. There will be a zero-tolerance policy for deviation from standards and practices.

NEO is committed to the advancement and intellectual enrichment of its team members. NEO will investigate options for superior vendors to provide responsible vendor training to be compliant with the standards set in 935 CMR 500.105(2)(b)(6). All candidates will be required to obtain a valid marijuana establishment agent registration card prior to application. All internal operations training will ensure that each marijuana establishment agent engaged in their assigned role has the proper education, training and experience to enable them to effectively perform all assigned and expected functions.

Positions at NEO Manufacturing:
General Manager: The General Manager oversees the entire facility and effectively manages the activities of all Manufacturing Staff and Cultivation staff including but not limited to, planning projects, scheduling work and completing tasks within specified timelines and approved budgets. Coordinating and manage the Production Manager to ensure that all company quality and compliance standards are met. Oversee all data entered into the state tracking system. Oversee the wholesale sales staff and review shipping manifests, weigh certificates, and invoices for outgoing products. Ensure all outgoing product is packaged and labeled correctly. Create and run reports of inventory consumption and ingredient usage, production metrics, and make informed decisions based on data to increase efficiency. Adjust SOPs to increase efficiency when necessary. Perform other related duties and projects as business needs require at direction of upper management.

Production Lead: The Production Lead will take charge of the entire production process for all products produced at NEO Manufacturing. Responsible for planning, organizing and recommending strategies in ensuring that the product is developed successfully, in accordance with all specifications and regulations. They supervise teams that work in operations and

product development. The Production Lead will ensure safety all standard operation guidelines are followed and will resolve any production issues.

Production Manager: The Production Manager's primary responsibility is to ensure that manufacturing processes run reliably and efficiently. The Manager will plan and organize production schedule and assess project and resource requirements. The Production Manager will make certain that production protocols are followed, that health and safety regulations and quality control standards are met.

Extraction Manager: The Extraction Manager role carries significant administrative, regulatory and compliance duties and responsibilities including the hiring, training, safety awareness, professional development and discipline of the laboratory employees. The Extraction Manager will be directly responsible for all marijuana extraction processing at NEO Manufacturing. They will ensure that regulatory compliance, including safety, environmental and document control requirements are met. The Extraction Manager will achieve production schedule and departmental objectives while promoting an environment of continual improvement and open communication with all levels of staff.

Executive Chef: This position exists to prep and cook cannabis infused edible products within the kitchen in the production department. The Executive Chef will help maintain and ensure compliance with NEO production and kitchen schedule, while safely and efficiently using equipment and supplies. The Executive Chef will oversee all kitchen support staff to ensure that production standards and schedules are met in compliance with all state and local regulations. The Chef is responsible for training all kitchen support employees.

Lab Tech: This position will assist the Extraction Manager with all extraction duties at NEO Manufacturing.

Sous Chef & Prep Cook: These positions will provide support to the Executive Chef in the kitchen producing edibles for NEO Manufacturing.

Packager: The primary role of the packager is to weigh and divide NEO's products and package it within in compliant child proof packaging and insure that the package is labeled in accordance with regulation.

Sales Manager: The Sales Manager will achieve growth and hit sales targets by successfully managing the sales team. The Manager is responsible for designing and implementing a strategic sales plan that expands company's customer base while overseeing all aspects of transportation compliance.

Wholesale Sales Representative and Transportation Specialists: They are responsible for cultivating relationships with potential customers and growing the number of licensed adult use retail establishments carrying NEO products and increasing sales volume. The sales staff will develop strong relationships with retail buyers, management and sales staff on behalf of NEO. Working with retailers to secure high visibility placement for products and displays while

communicating NEO's value proposition and consumer safety educational messaging. Coordinating and executing in-store consumer education events. Delivering the product following all transportation regulations promulgated by the Commission.

Marketing and Branding Strategies:
NEO's brand identity is rooted in the concept of fair pricing for good value of money. This branding strategy is geared towards the value conscious consumer looking for a quality product at a value-oriented price. NEO's packaging and retail display brand messaging will convey a notion of simplicity, quality and value. The primary vehicle of this branding messaging will be the educational efforts of NEO's wholesale staff. NEO's staff will strive to effectively communicate the value proposition to the sales staff at licensed adult use retail marijuana establishments in Massachusetts. NEO product messaging will also rely heavy on safe and responsible product usage for the consumer incorporating a start low, go slow directive.

Sales & Distribution:
The sales and distribution process will be a straight forward approach with NEO's internal wholesale sales staff will be responsible for the entire sales process. Sales representatives will first identify and verify licensed retail marijuana establishments before attempting to sell and distribute. Once a retail marijuana establishment becomes a customer, the sales representative will be responsible for training and educating that establishments agents on all value propositions of NEO products in addition to responsible consumption practices and consumer safety.

Transporter License:
Neo Manufacturing intends to obtain an existing licensee transporter license from the Commission. All marijuana establishment agents hired to perform NEO's sales will possess qualifications required for the transporter license. NEO transporters will have and maintain a valid class D driver's license issued by the Commonwealth of Massachusetts. Each transporter will require an additional 5 hours of "Behind the wheel" training in addition to the standard eight hours of responsible vendor training provided to all NEO marijuana establishment agents. This training will include standard driving and road safety and will also cover transport best practices. Each transport agent will show superior mastery of driving skills, concentration abilities, written and verbal communication skills, attention to detail and exceptional interpersonal skills.

SALES FORECAST:

Product Revenue	Wholesale Price	2020 Totals	2021 Totals
Edibles	$20.00	$2,638,900	$4,693,700
Vape Pens	$35.00	$4,618,075	$8,213,975
Pre Rolls	$30.00	$719,700	$1,280,100
NEO Product Totals		$5,982,506	$10,640,831
Licensed Product Totals		$1,994,169	$3,546,944

Product Totals		$7,976,675	$14,187,775

FINANCIAL SUMMARY AND PLAN:

Start-up Summary:

Facility Buildout	$	1,100,000
HVAC Extraction	$	120,000
Security	$	75,000
Office Furniture & Fixtures	$	25,000
Extraction & Processing Lab	$	475,000
Extraction Room	$	49,000
Commercial Kitchen Equipment	$	156,000
Kitchen Product & Supplies	$	50,000
Pen & Cartridge Filling	$	75,000
Packaging & Processing	$	150,000
Pre Roll Equipment	$	55,000
Delivery Vans	$	100,000
Shelving & Carts	$	10,500
Fixtures	$	15,000
Inventory Tracking System	$	30,000
Computers	$	20,000
Vault Storage	$	5,000
	$	**2,510,500**

Assumptions:

1. Analysis is for build out for 1 facility, each new facility will require similar Capex and 2/3 of operating costs for start up
2. 2020 operations modeled at average capacity of 48%
3. 2021 operations modeled at average capacity of 85%
4. 25% of capacity deployed towards partnered licensed products at 25% reduction in profits
5. Financials assume a single day shift- can add a night shift to enhance output
6. Product mix limited to a core mix of edibles, vape pens and pre-rolls
7. No revenue added for licensing our brands to other manufacturers
8. No revenue added for partnership for build out of cultivation facility under our license

Operating Expenses:

COG's	**2020 Total**
Purchased Trim	$1,757,468
Purchased Flower (B)	$295,125
Extraction Supplies	$113,473
Labor	$557,360
Packaging	$688,513
Lab Testing	$220,708
Lease Expense	$114,000
Utilities	$42,000
Licensing Fees	$270,194
Taxes	-
Total COGs	$4,058,841
GROSS PROFIT	**$3,917,834**

Overhead Costs:	
Executive Payroll	$660,000
Administrative Payroll	$295,155
Sales / Distribution Payroll	$197,600
Security Labor	$62,400
Benefits Cost	$364,567
Depreciation	$286,929
T & E Sales	$60,000
Community Host Agreement	$239,300
Local Municipality Fee	$25,000
Licenses, Dues, & Subscriptions	$18,000
Telephone, Internet & Computer	$12,000
Office Rent	$22,500
Security Monitoring	$4200
Software Expense	$24,000
Prof Fees Legal & Accounting	$48,000
Marketing & PR	$60,000
Brand & Product Development	$60,000
Bank Service Fees	$3000
General Liability Insurance	$3500
Auto Insurance	$5400
EPLI Insurance	$1500
Equipment Insurance	$6000
Total Annual Expenses	**$2,530,745**
Net Operating Profit	**$1,387098**
Cumulative Net Operating Profit	**$119,420**

CAPITALIZATION CERTIFICATION:

NEO Manufacturing certifies that it is secure in its start-up and first year operation funding. The company is prepared to meet the capital requirements, with NEO Organics LLC providing the financing for the project. NEO also certifies that all funds were and will be lawfully obtained in accordance with regulation.

MAINTAINING OF FINANCIAL RECORDS:
All company financial records will be maintained by the NEO CFO and supporting Accounting and Financial Team through use of the Microsoft powered Cannabis 365 software program. The NEO CFO has extensive experience in working with and navigating this financial record-keeping system to ensure compliance with established Commission guidelines as well as to best utilize for business intelligence and insight.

The CFO and establishment agents that support daily accounting functions will maintain computerized business records, which shall include at a minimum:

- assets and liabilities in the form of daily balance sheet that will be maintained;
- monetary transactions;
- books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, manifests and vouchers;
- sales records, wholesale invoice records and transport manifests including the quantity, form, batch id, production id, and cost of marijuana products; and
- salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment.

Access Restriction to Individuals under 21

Pursuant to 935 CMR 500.101 (1) and (2), marijuana will only be accessible to consumers 21 years of age or older with a verified and valid, government-issued photo ID.
Valid forms of ID:

- Passport
- Driver's License
- Military ID
- State issued photo ID

Upon entry into the premises of the marijuana establishment by an individual, a NEO agent will immediately inspect the individual's proof of identification and determine the individual is over 21, in accordance with 935 CMR 500.140(2).

- All visitors to any NEO facility must be 21 years of age or older, as per 935 CMR 500.002;
- All consumers entering any marijuana establishment must be 21 years or older unless the establishment is co-located with a MTC, as per 935 CMR 500.050 (5);
- In the event NEO discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified,
- Pursuant to 935 CMR 500.105(1)(l). NEO will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).
- Pursuant to 935 CMR 500.105(4), NEO will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21.
- NEO will not engage in any advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data.
- NEO will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).
- In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, "**For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana.**"
- Pursuant to 935 CMR 500.105(6)(b), NEO packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.
- NEO' website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS:

Suitability for Employment as registered agent with NEO

NEO registered agents will be recruited not only for their qualifications and active status as a registered marijuana establishment agent under 935 CMR 500.802, but also for their enthusiastic commitment to upholding superior standards of operation and manufacturing of quality marijuana products and extracts to be enjoyed by qualified adults of the Commonwealth age 21 and older.

A staffing plan including hiring decisions, will be made using all requirements and suitability standards set forth by the Commission in 935 CMR 500.105(9) and Table D. The plan will include an analysis in attracting the right type of personnel to fit the company's needs. These measures will ensure that the team, behind NEO remain dedicated to the continual and compliant operation of the licensed marijuana establishment.

Previous to consideration for employment, all candidates will be required to obtain a valid marijuana establishment agent registration card issued by the Commission that must be carried by the agent at all times.

Periodic employment evaluations will be performed among all agents employed with NEO to ensure job satisfaction as well as to maintain overall morale and workplace function. Such evaluations will require a follow up report from the executive performing the evaluation and will be recorded in the agents personnel file.

Background Checks

All background checks performed as a precursor to employment with NEO as a registered agent will be conducted in accordance with guidelines and requirements set forth in 935 CMR 500.800.

Information Required for Application as a Registered Agent

In addition to information determined by executive management, all registered agents seeking employment with NEO will be required to submit a copy of all information mandated by the Commission under 935 CMR 500.030 to be considered. If hired, this information will be kept in the registered agent's personnel file for the duration of their employment and for the required 12 month period following termination.

Responsible Vendor Training (Mandatory)

Thorough and comprehensive training and guidance will be provided to all registered NEO Cultivation agents upon hire, receipt and proof of valid marijuana establishment agent registration card issued by the Commission, and throughout the duration of the agent's employment at NEO so as to satisfy the minimum 8 required hours of Responsible Vendor Training annually as required by 935 CMR 500.105(2)(b). NEO will routinely investigate options for superior qualified vendors to provide responsible vendor training, so as they are compliant with standards set in 935 CMR 500.105(2)(b)(6).

Each Responsible Vendor Training session will maintain clearly documented records, which will be kept on file for a minimum of 4 years and be easily accessible to be made available to the Commission or other authority at their request as to satisfy 935 CMR 500.105(2)(b)(5) and (2)(6)(f), that will record, at minimum, the following information:

• Full legal names & positions of all marijuana establishment agents in attendance,

• Marijuana establishment agent registration card number,

• Topic(s) of training,

• Name and title of instructor(s) or presenter(s),

• date,

• Length of training including start and stop time;

• Location of training (note if remote or digital attendance;

• Any applicable attachments, handouts, or documents,

• Signed statement from each registered agent in attendance affirming accuracy of all information

NEO is committed to the advancement and overall intellectual enrichment of its team members from executive level to registered agents performing daily production tasks, no team member is seen as unessential in the process. A NEO team member shall never feel restricted from asking to discuss with their supervisor any educational or training opportunities that may advance their ability to fulfill their skillset or advance personal or professional development.

All internal operations training will ensure that each marijuana establishment agent engaged in their assigned role has the proper education, training, and experience, or a combination thereof, to enable them to perform all assigned and expected functions. Personnel training will also include instructions or procedures regarding state or local regulatory inspection preparedness, potential interactions with law enforcements both local and federal. Training will also cover relevant information on US federal, state, and local laws, regulations, policies and changes in policy relating to business participating in these operations, as well as individual employed in these operations and the potential associated implications of these for such persons. NEO will offer continuing education relevant to the agent's position and applicable regulation changes, but a baseline knowledge is a prerequisite for employment.

Alcohol & Drug Policy

Drug and/or alcohol abuse contributes to billions of dollars of lost productivity and thousands of work place injuries every year. Our policy, as per 935 CMR 500.105 (j), is to employ a work force free from alcohol abuse or the use of illegal drugs. NEO takes drug and alcohol abuse as a serious matter and will not tolerate it. NEO absolutely prohibits the use of alcohol or non-prescribed drugs at the work place or while on company premises. It also discourages non-workplace drug and alcohol abuse. The use, sale or possession of alcohol or drugs while on the job or on company property will result in disciplinary action, up to and including termination, and may have legal consequences. Employees are expected and required to report to work on time and in appropriate mental and physical condition for work. It is our intent and obligation to provide a drug-free, healthful and safe work environment.

NEO reserve the right to demand a drug or alcohol test of any employee based upon reasonable suspicion. Reasonable suspicion includes, but is not limited to, physical evidence of use, involvement in an accident, or a substantial drop off in work performance. Failure to take a requested test may lead to discipline, including possible termination.

NEO also caution against use of prescribed or over-the-counter medication which can affect your workplace performance. You may be suspended or discharged if the company concludes that you cannot perform your job properly or safely because of using over-the-counter or prescribed medication, which may affect your performance.

Employees must report any conviction under a criminal drug statute for violations occurring on or off NEO premises, while conducting company business. A report of conviction must be made within one (1) day after the conviction. NEO will make every effort to assist its employees who wish to seek treatment or rehabilitation for drug and/or alcohol dependency. Conscientious effort to seek such help will not jeopardize any employee's job and will not be noted in any employee record. You may also be required to agree to random testing and a "one-strike" rule.

NEO prohibits smoking and/or vaping on company premises.

Immediate Dismissal of Dispensary Agents

NEO will take immediate action should a dispensary agent engage in the following:

Diverting marijuana, which shall be reported to law enforcement officials and to the Cannabis Control Commission (CCC);

Involved in unsafe practices regarding the operation of the marijuana establishment, which shall be reported to the CCC;

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 MA, or a like violation of the laws of another state, the United States of a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Upon termination of employment, NEO will inform the Commission of the update in employment status of the registered agent as soon as possible and no later than 24 hours after the termination. At this time, all access codes, keys, badges, employment manuals and any other material or equipment owned by the marijuana establishment will be returned and all access to limited access areas, inventory control systems or surveillance systems will be deactivated. Personnel records for the individual will remain on file for the mandatory 12 month period following termination.

Confidentiality

Personal information held by NEO about employee and/or consumers is confidential and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction, provided however, the CCC may access this information to carry out official duties.

NEO dispensary agents will receive confidentiality training during new hire orientation and at minimum will receive documented mandatory confidentiality training on an annual basis.

NEO software provider harbors the technology required to abide with regulatory standards and prevent theft. The software was developed to establish the highest level of security for the marijuana industry. It comes equipped with multiple features to ensure security, theft protection and compliance diversions. All hardware is managed and maintained internally. Unlike cloud based solutions where the customer relies on the software vendor and cloud provider, our system provides added security as the system links to SSAE 16 certified server locations to ensure the highest level of security. In the event of an automatic failure, the software system also works with redundant routers to maintain business records and system functionality. System authentication is encrypted via industry standard SSL with the use of a server based platform. Access to consumer information, including sales transactions will be available only to those agents performing dispensing duties.

NEO will work with IT professionals to ensure computer software and other IT infrastructure is updated regularly. In addition, NEO network servers will be protected by SSL and locked in a Limited Access Area under twenty-four (24) hour surveillance. In the event a consumer requests information via email, the email will be sent on secure servers, either individually or using BCC, and will not provide consumer info or refer to marijuana in the subject line in order to protect the recipient's privacy.

Any loss/alteration of records related to a will be reported to CCC, the protected party, and if necessary law enforcement.

NEO Manufacturing Qualifications and Training
935 CMR 500.101 (1) & (2)

NEO is committed to the advancement and intellectual enrichment of its team members from executive level to registered Manufacturing agents. No NEO team member shall feel restricted from asking their supervisor on any educational or training opportunities that may advance their ability to fulfill their skill-set or advance personal or professional development.

NEO team members will be recruited not only for their qualifications as a registered marijuana establishment agent under 935 CMR 500.802, but also for their enthusiastic commitment to upholding superior standards of operation and cultivating of quality marijuana to be enjoyed by qualified adults of the Commonwealth age 21 and up. This will ensure that the NEO team remain dedicated to the continual and compliant operation of the Manufacturing facility.

NEO will routinely investigate options for superior vendors to provide responsible vendor training, so as they are compliant with standards set in 935 CMR 500.105(2) (b)(6).

Previous to consideration for employment, all candidates will be required to obtain a valid marijuana establishment agent registration card prior to application. NEO will offer continuing education relevant to the agent's position and applicable regulation changes, but a base-line knowledge is a prerequisite for employment.

All internal operations training will ensure that each marijuana establishment agent engaged in their assigned role has the proper education, training, and experience or combination thereof, to enable them to perform all assigned and expected functions. Personnel training will also include instructions or procedures regarding state or local regulatory inspection preparedness, potential interactions with law enforcement, both local and federal. Training will also cover relevant information on US federal, state, and local laws, regulations, policies and changes in policy relating to business participating in these operations, as well as individual employed in these operations and the potential associated implications of these for such persons.

Comprehensive training will be provided to all registered NEO agents upon hire, receipt of valid marijuana establishment agent registration card, and throughout the duration of the agent's employment at NEO so as to satisfy the minimum required hours of Responsible Vendor Training annually as required by 935 CMR 500.105(2)(b).

NEO will ensure that all employees hired to work at a NEO facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

NEO will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that NEO discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and NEO will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Manufacturing Staffing Plan

Director of Operations
Director of Sales/Marketing
Director of Distribution
Sales Reps
Packaging Lead
Packagers
Delivery Drivers
Food Scientist
Production Chef
Production Assistant
Head Extractor
Lab Technician

NEO Manufacturing Qualifications and Training
935 CMR 500.101 (1) & (2)

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of NEO agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

On or after January 1, 2020, all of NEO current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to agents.

NEO new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. NEO owners, managers, and employees will then successfully complete the program once every year thereafter. NEO will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance.

Responsible Vendor Program

As part of the Responsible Vendor program, NEO agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;
4. Acceptable forms of identification, including verification of valid photo identification and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, such as:
   - Local and state licensing and enforcement;
   - Incident and notification requirements;
   - Administrative and criminal liability and license sanctions and court sanctions;
   - Waste disposal and health and safety standards;
   - Patrons prohibited from bringing marijuana onto licensed premises;
   - Permitted hours of sale and conduct of establishment;
   - Permitting inspections by state and local licensing and enforcement authorities;
   - Licensee responsibilities for activities occurring within licensed premises;
   - Maintenance of records and privacy issues; and
   - Prohibited purchases and practices.

Each Responsible Vendor Training Session will maintain documented records, which will be kept for a minimum of 4 years and be easily accessible to be made available for inspection by the Commission or other state licensing authority upon request as to satisfy 935 CMR 500.105(2)(b)(5) and (2)(6)(f), that will record, at minimum, the following information:

- Full Legal Names & Positions of Agents in Attendance,
- Marijuana establishment agent registration card number,
- Topic(s) of Training,
- Name and Title of Instructor or Presenter
- Date,
- Length of Training,
- Location of Training (note if remote or digital),
- Any Applicable Attachments or Documents,
- Signed Statement from AGENT affirming all information is accurate.

NEO Manufacturing Qualifications and Training
935 CMR 500.101 (1) & (2)

NEO Manufacturing Quality Control and Testing
935 CMR 500.101(1)(c); 935 CMR 500.101 (2)(e)

Overall Testing & Quality Control (QC) Goals
Quality control and analytical testing standards must be followed in order to provide this assurance of consistency and safety in products that will be delivered to the end consumer.

The main goal of NEO Manufacturing is to produce consistent and quality marijuana products for the general adult use population of the Commonwealth. NEO will provide a range of edible and concentrate products for a variety of consumption/administration methods for consumers.

NEO will test samples from all production batches used in manufacturing to ensure that all marijuana products meet testing requirements established by the Commission and are fit for consumption. Samples will be submitted for testing to a licensed third-party laboratory through a predetermined pickup schedule to ensure consistent frequency of testing. NEO has chosen to randomize control over the testing schedule so as to deter possible alternation of information by instituting internal checks.

Any materials or supplies that enter the NEO premises are subject to testing to ensure safety and accurate product knowledge. All ingredients, including active, inactive, extracts, water and equipment will be tested to ensure the absence of contaminants as well as to establish a chain of custody to track down the source of any contaminants, if discovered.

All equipment and machinery used in manufacturing, extracting, processing, refining, baking, mixing, and packaging marijuana products will be regularly serviced to maintain optimal function. An on hand inventory of maintenance equipment including back up equipment, cleaning supplies and equipment parts will be stocked on premise at the marijuana establishment to ensure minimal downtime for production at the facility.

Marijuana and Marijuana Product Testing for Contaminants & Potency
All marijuana products and extracts will be tested for the cannabinoid profile and for contaminants, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and non-organic pesticides in compliance with DPH regulations and protocols and any additional requirements set forth by 935 CMR 500.160. All testing records will be maintained on file for at least one (1) year. In the event that testing reveals unacceptable levels of contaminants or undesirable cannabinoid profiles, NEO agents will be responsible for following corrective procedures in response to such test results and pursuant events.
NEO's testing response policy will be made readily available to the Commission and local law authorities upon request. Frequency of testing and auditing of testing preparation procedures will be compliant with all protocols and guidance issued by the Commission and the DPH.

Testing of all marijuana products shall be performed by a Commission approved Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH.
Laboratory analysis will be performed by a third-party analytical laboratory that is:

- In compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH;
- Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body such as A2LA or ACLASS; and/or
- Certified, registered, or accredited by an organization approved by the CCC, or otherwise acknowledged by the Department of Public Health. In collecting samples of marijuana products after extraction or manufacturing,

NEO Manufacturing Quality Control and Testing
935 CMR 500.101(1)(c); 935 CMR 500.101 (2)(e)

NEO will:

- establish and maintain a contractual relationship with an approved third party testing laboratory, approved and licensed by the Commission and in good standing
- ensure all storage and transportation of testing samples will be under conditions that will protect against physical, chemical and microbial contamination. All storage and transportation of testing samples will comply with 935 CMR 500.105(11) and 935 CMR 500.105(13), respectively.
- ensure that all excess marijuana from testing is returned to the point of origin and disposed of pursuant to 935 CMR 500.105(12).
- ensure that no marijuana or marijuana products produced at the facility will be made available for sale or marked suitable for adult use that is not capable of being tested by an Independent Testing Laboratory 935 CMR 500.160.

All marijuana will be tested for the cannabinoid profile and for contaminants, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and non-organic pesticides in compliance with CCC regulations and protocols and any additional requirements set forth by 935 CMR 500.160.
In the event that testing reveals unacceptable levels of contaminants or undesirable cannabinoid profiles, NEO will notify the Commission within seventy-two (72) hours of any laboratory testing results indicating contamination, if contamination can be remediated or if production batch needs to be disposed. The notification must be from both NEO and the Independent Testing Laboratory, separately and directly.
NEO's Director of Operations will be responsible for establishing corrective procedures in response to such test results and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
NEO's testing response policy will be available to the Commission and local law authorities upon request. Frequency of testing will be compliant with all protocols and guidance issued by the Commission.

As per 935 CMR 500.105 (3):
NEO will ensure that floors, walls and ceilings be constructed in such a manner that they may be adequately kept clean and in good repair.
NEO will ensure that the plumbing will be of adequate size and design and maintained to carry sufficient quantities of water throughout the facility and supply water for necessary operations.
NEO will supply employees adequate and readily accessible toilet facilities.
NEO shall Process the leaves and flowers of the female Marijuana plant only, which shall be:

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

In collecting samples of edibles and concentrates, NEO agents whose job includes contact with marijuana are subject to the requirements for food handlers specified in 105 CMR 300.000.
NEO agents will conform to sanitary practices, while on duty:

- Maintaining adequate personal cleanliness;
- Washing hands appropriately.

Hand washing stations will be located in production areas and where good sanitary practices require employees to wash and sanitize their hands.
NEO production agents will:

- ensure that all contact surfaces will be maintained, cleaned and sanitized as frequently as necessary to protect against contamination.

NEO Manufacturing Quality Control and Testing
935 CMR 500.101(1)(c); 935 CMR 500.101 (2)(e)

- ensure that there will be sufficient space for placement of equipment and storage of materials, necessary for sanitary operations.
- wear disposable gloves to mitigate the potential for contamination of samples;
- ensure that the sampling area is clean and decontaminated and lay out any tools and equipment needed;
- ensure samples of all marijuana products will be properly homogenized prior to analysis.
- collect the sample using an appropriate tool that has been cleaned and sanitized and use caution to not touch the sample with hands or allow the sample to touch anything that might cause cross contamination;
- clean and sanitize any tools or equipment that comes in contact with the finished marijuana products or other marijuana products in production before collecting the next sample, to avoid cross contamination of samples;
- if necessary, place the sample in a stainless-steel bowl or on a decontaminated and sterilized cutting surface for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement;
- record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
- ensure that all samples be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers will be firmly closed and appropriately labeled with production batch or sampling source information.
- all samples will be refrigerated or maintained on ice until shipped to the analytical laboratory to preserve the chemical and biological composition of the samples;
- ensure all litter and waste will be properly removed to minimize odors and the potential for harboring pests, as per 935 CMR 500.105 (12);
- ensure all toxic items will be identified, held and stored to protect against contamination of marijuana
- complete manifests immediately prior to shipment to the third party approved analytical testing laboratory.

<u>Serving Size</u>
NEO will determine serving size, but in no instance shall an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine-tetrahydrocannabinol (9-THC) subject to the testing variance specified in 935 CMR 500.160 (11).

As per 935 CMR 500.150 (4)(a), single servings of marijuana products tested for potency shall be subject to a potency variance of no greater than plus/minus 10 percent (+/- 10%).

NEO will ensure that each single serving of an edible is physically demarked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC.

- Each serving of an edible within a multi-serving package of edible must be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort, individual servings of the product.
- Each single serving of an edible contained in a packaged unit of multiple edibles shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana.

<u>Labeling & Packaging for Edibles</u>
NEO will ensure that the following information is affixed to every container holding an edible

marijuana product:

- If the edible is perishable or time and temperature controlled, and if the edible needs to be refrigerated;
- The date the edible was produced;
- Nutritional panel and number of THC servings, container;
- Information regarding the size of each serving by milligrams and total amount of active THC by milligrams; and
- A warning that the effects of the edible may be delayed by two (2) hours or more.

Dosing Limitations

A Marijuana Product Manufacturer may not prepare, and a Marijuana Retailer may not deliver, sell or otherwise distribute an Edible Marijuana Product with potency levels exceeding the following, as tested by an independent Marijuana testing facility licensed in accordance with M.G.L., c.4G ,

(a) For a single serving of an Edible Marijuana Product, five milligrams (5mg) of active tetrahydrocannabinol (THC);

(b) In a single package of multiple Edible Marijuana Product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams (100mg) of active THC; and

(c) The THC content must be homogenous, or evenly distributed throughout the Edible Marijuana Product. A Retail Marijuana Product shall be considered to not be homogenous if 10% of the infused portion of the Marijuana Product contains more than 20% of the total THC contained within entire Marijuana Product.

NEO will not sell nor market any marijuana products for adult use that has not been first tested by a CCC licensed Independent Testing Laboratory and complies with 935 CMR 150.160.

Recordkeeping

NEO Cultivation will establish and maintain all policies and procedures related to record-keeping to reflect the most up to date versions and keep these available to NEO registered agents at all times.
NEO financial, inventory, seed to sale, waste disposal and operational records will be maintained electronically on an established, secure, enterprise level system provider. Additionally, the marijuana establishment will elect to use Cannabis 365 as an electronic record retention system. Each electronic log will be accompanied by a digital fingerprint of the NEO agent that performed the action, and is auditable with a time and date stamp on the action.
Policies and procedures for inventory control and reporting will be documented in an SOP that will then be electronically archived so that it can be accessed at any time by a registered agent or a representative of the Commission or local law enforcement.
All personnel records will be stored securely and electronically.
A well-documented staffing plan with an outline for keeping fairly extensive personnel records will allow new hires to be evaluated as per a standard determined by previous hires.
In the event that NEO ceases to operate as a licensed marijuana establishment, all records kept during the course of business as required by the Commission will be maintained for a minimum of 2 years and will be readily accessible by the Commission or local law enforcement, pending request to produce such records.

NEO will keep and retain all records as noted in this policy, in accordance with generally accepted accounting principles (GAAP). In addition, NEO' operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- Corporate Records: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
  - Insurance Coverage:
    - Directors & Officers Policy
    - Product Liability Policy
    - General Liability Policy
    - Umbrella Policy
    - Workers Compensation Policy
    - Employer Professional Liability Policy
      - Third-Party Laboratory Contracts
      - Commission Requirements:
    - Annual Agent Registration
    - Annual Marijuana Establishment Registration
      - Local Compliance:
    - Certificate of Occupancy
    - Special Permits
    - Variances
    - Site Plan Approvals
    - As-Built Drawings
      - Corporate Governance:
    - Annual Report
    - Secretary of State Filings

- Business Records: Records that require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
  - Assets and liabilities;

○ monetary transactions;
○ Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
○ Sales records including the quantity, form, and cost of marijuana products;
○ Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with NEO, including members, if any.

Personnel Records:
At a minimum will include:
○ Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
○ Personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with NEO and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- Job description or employment contract that includes duties and responsibilities
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations; and
- Record of any disciplinary action taken.
- Notice of completed responsible vendor and eight-hour related duty training.

○ a staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
○ Personnel policies and procedures; and
○ all background check reports obtained in accordance with 935 CMR 500.105(9).
Handling and Testing of Marijuana Records
○ NEO will maintain the results of all testing for a minimum of one (1) year.
Inventory Records
○ the record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
Seed-to-Sale Tracking Records ○ NEO will use seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8) and (9), including, at a minimum, an inventory of all marijuana and marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.
○ Within ten (10) calendar days, NEO will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by NEO for no less than one (1) year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

○ a visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

Waste Records when marijuana or marijuana products are disposed of, NEO will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two NEO agents present during the disposal or handling, with their signatures. NEO will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Video Recordings: Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days.

Shipping Manifests NEO will retain all shipping manifests for a minimum of one (1) year and make them available to the Commission upon request.

Training: documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).

Written Operating Policies and Procedures: Policies and Procedures related to NEO' operations will be retained and updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

Record-Retention

NEO will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations

DIVERSITY PLAN:
Diversity Staffing Plan & Non-Discrimination Policy

All hiring and staffing decisions reflect NEO's overall employment values as an equal opportunity employer, dedicated to a policy of nondiscrimination in employment on any basis including race, color, creed, religion, gender, sexual orientation, national origin, veteran status, age, disability, and any other status protected by law. NEO Manufacturing intends to exceed expectations of 935 CMR 500.101(1)(c)(7)(k) through implementation of a diversity plan which will promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+, in the operation of the Marijuana Establishment.

NEO will focus on the recruiting and hiring quality employees who represent a diverse segment of society. The company will strive to hire, train and retain high quality, high performing employees and building a more diverse talent pool. NEO will develop strategies for effective communication to enhance understanding and bridge differences up, down, and across the company to create a Positive Workplace Culture.

NEO Manufacturing Diversity Goals:

Workforce Diversity: NEO Manufacturing seeks to hire local workforces that are at least as diverse as that community as such it will recruit from a diverse, qualified group of potential applicants to secure a high-performing workforce drawn from all segments of society. This plan promotes equity among minorities; women; veterans; people with disabilities; and people of LGBTQ+.

Workplace Inclusion: Cultivate a culture that encourages collaboration, flexibility, and fairness to enable individuals to contribute to their full potential; and

Sustainability: Develop strategies to equip leaders with the ability to manage diversity and provide the opportunities and training to individuals who are of diverse backgrounds in the community.

NEO's Manufacturing Facility will hire a total of 25 full time equivalent employees for the operation of its facility. NEO intends to promote equity by providing all applicants with the same opportunities and to level the playing field to be successful in its recruiting and hiring efforts, training and operations. It is the Company goal to hire 40% of its workforce from among minorities; women; veterans; people with disabilities; and people of LGBTQ+. . The Company shall hire 70% Women from the workforce.

NEO Manufacturing Diversity Programs:

Diversity Recruitment Initiatives: To ensure equity in the recruiting process, NEO intends to utilize number of diverse outreach methods to advertise its available positions and attract diversity and minority applicants. Diversity and inclusion will be incorporated into the following recruiting effort:

- Networking within professional circles, industry and professional trade groups.
- Attending one or more annually Multi-Cultural Job Fairs – focusing on racial minority groups in the Medway Vicinity (Black, African American, Latino, Asian.)
- A minimum of 4 times a year NEO will participate in or hold Job Fairs on Meetup.com.
- Cannabis Expos, Symposiums and Career Fairs.

- Job Posting Websites: Ziprecruiter.com, Indeed.com, Careerbuilder.com, Jobs.com, Glassdoor.com, Greenstreetjobs.com.
- Social Media.
- Focused Sourcing: Recruitmilitary.com, military.com, womensjoblist.com, outpronet.com, militaryvetjobs.com, Mass Hire Job Quest.
- College Recruitment.
- Cannabis Recruiting Companies.
- Employee Referrals and Promoting from within our diverse organization.
- Geographic targeting Walpole, MA.

NEO will begin media and advertising its available positions 90 days prior to receiving its facility's Certificate of Occupancy, with hiring occurring 30 days prior. All progress and success of NEO will be documented one year from provisional licensure, and each year thereafter. All the advertising, branding market and sponsorship practices of NEO, will adhere to the requirements set forth in 935.CMR 500.105 (4). All programs implemented by NEO will not violate the Commission's regulation with the respects to limitations on ownerships or control or other applicable state laws

Staff Cultural and Diversity Training: In its efforts to retain an effective and diverse workforce, NEO will invest in the development of its inclusive company culture to ensure its sustainability. NEO considers inclusion to occur when a diversity of people feels valued and respected, have access to opportunities and resources, and can contribute their perspectives to improve their organization. It has developed strategies and trainings for effective communication to enhance understanding and bridge differences throughout the Company workforce in order to create a diverse and multicultural workplace culture. A key element of its strategic operations plan is to create an environment in which diverse members can envision themselves in leadership positions. All ownership, management, and staffing are part of the entity's diversity and the goal is to make everyone's needs and concerns a part of the corporate culture and to be known as a place where all kinds of people succeed.

NEO's Diversity and Cultural awareness training will include:

Raising cultural awareness- Sensitivity and diversity training can help NEO's agents recognize and respond to their unconscious or hidden bias based on stereotypes and unfair assumptions.

Changing behaviors- Diversity and cultural awareness training explores inclusivity and the actions associated with improved teamwork and customer service.

Improving communication skills- Cultural sensitivity training helps employees understand the nuances of cross-culture communication, i.e. the importance of words, actions, gestures and body language in cultivating relationships with different people and groups.

The Diversity and Cultural awareness training will delve into the following topics:

- Define cultural awareness and the diverse cultures in the workforce communities.
- Cultural values and attitudes.
- Communication styles.
- Cross-cultural management skills.
- Developing cultural awareness and the Company plan of action.
- Language issues.
- Tips for specific countries, religions, veterans, genders, LGBTQ+, and abilities.

Diversity Plan Measurements:

In order to effectively track its success and improve equity recruiting and hiring, NEO will implement Program Tracking and Measurements metrics that will be analyzed every six

months. These metrics will include both quantitative and qualitative data analysis.

Quantitative Metric Analysis:

1. The number of total positions created and filled by the company within the first year of licensed operation.
2. The number of women, minorities (Black, Latino, Asian,) veterans, people with disabilities, and LGBTQ+ who were hired.
3. The number of women, minorities (Black, Latino, Asian,) veterans, people with disabilities, and LGBTQ+s who were retained.
4. The number of women, minorities (Black, Latino, Asian,) veterans, people with disabilities, and LGBTQ+s who were promoted.
5. The number of job postings by recruiting source.
6. The number of responses per recruiting source.
7. The number of hires per recruiting source.
8. Employee retention rates.

Qualitative Metric Analysis:

1. Employee/Management teamwork analysis.
2. Workflow Analysis.
3. Employee Retention Analysis.
4. Disciplinary Action Analysis.

Through a cross analysis of both the quantitative and qualitative metrics, NEO Manufacturing will determine its Diversity Program efficacy and make adjustments to ensure that minimum goals are attained and preferably exceeded.