



# Massachusetts Cannabis Control Commission

## Marijuana Retailer

### General Information:

**License Number:** MR281252  
**Original Issued Date:** 08/13/2018  
**Issued Date:** 10/08/2020  
**Expiration Date:** 10/13/2021

## ABOUT THE MARIJUANA ESTABLISHMENT

**Business Legal Name:** Pharmacannis Massachusetts Inc.

**Phone Number:** 508-649-9858      **Email Address:** compliance@pharmacann.com

**Business Address 1:** 112 Main Street

**Business Address 2:**

**Business City:** Wareham

**Business State:** MA

**Business Zip Code:** 02571

**Mailing Address 1:** 112 Main Street

**Mailing Address 2:** PO Box 391

**Mailing City:** Wareham

**Mailing State:** MA

**Mailing Zip Code:** 02571

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

**Certified Disadvantaged Business Enterprises (DBEs):** Not a DBE

## PRIORITY APPLICANT

**Priority Applicant:** yes

**Priority Applicant Type:** RMD Priority

**Economic Empowerment Applicant Certification Number:**

**RMD Priority Certification Number:** RP201821

## RMD INFORMATION

**Name of RMD:** Pharmacannis Massachusetts Inc.

**Department of Public Health RMD Registration Number:** N/A

**Operational and Registration Status:** Obtained Provisional Certificate of Registration only

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

**If no, describe the circumstances below:**

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

**Person with Direct or Indirect Authority 1**

**Percentage Of Ownership:** 0.04

**Percentage Of Control:** 0.04

**Role:** Other (specify)

**Other Role:** Executive Director

**First Name:** Michelle

**Last Name:** Stormo

**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: Non-hispanic

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 22.56

Percentage Of Control: 22.56

Role: Executive / Officer

Other Role:

First Name: Stephen

Last Name: Schuler

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: Other (specify)

Other Role: Director of Security

First Name: Jeremy

Last Name: Unruh

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: Pharmacann LLC

Entity DBA: Pharmacannis

DBA City:

Wareham

Entity Description: Illinois Limited Liability Company

Foreign Subsidiary Narrative:

Entity Phone:

Entity Email:

Entity Website: www.pharmacann.com

Entity Address 1:

Entity Address 2:

Entity City:

Entity State:

Entity Zip Code:

Entity Mailing Address 1:

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State:

Entity Mailing Zip Code:

Relationship Description: PharmaCann Inc. is the parent company of PharmaCannis Massachusetts Inc. PharmaCann LLC was converted to PharmaCann Inc. in January of 2020. The conversion was not the result of a change of ownership or control.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Stephen

Last Name: Schuler

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Stephen Schuler is a Board Member and an investor of PharmaCann Inc., which is the parent company of PharmaCannis Massachusetts, Inc.

Close Associates or Member 2

First Name: Norah

Last Name: Scott

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Norah Scott is the co-founder and an investor of PharmaCann Inc., which is the parent company of PharmaCannis Massachusetts, Inc.

Close Associates or Member 3

Date generated: 12/03/2020

First Name: Daniel

Last Name: Tierney

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Daniel Tierney is a passive investor of PharmaCann Inc., parent company of PharmaCannis Massachusetts, Inc.

**CAPITAL RESOURCES - INDIVIDUALS**

Individual Contributing Capital 1

First Name: Stephen

Last Name: Schuler

Suffix:

Types of Capital: Monetary/  
Equity

Other Type of  
Capital:

Total Value of the Capital Provided:  
\$5000013.33

Percentage of Initial Capital:  
48.81

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Daniel

Last Name: Tierney

Suffix:

Types of Capital: Monetary/  
Equity

Other Type of  
Capital:

Total Value of the Capital Provided:  
\$5000013.33

Percentage of Initial Capital:  
48.81

Capital Attestation: Yes

Individual Contributing Capital 3

First Name: Norah

Last Name: Scott

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$470 Percentage of Initial Capital: 14.35

Capital Attestation: Yes

Individual Contributing Capital 4

First Name: Teddy

Last Name: Scott

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$30 Percentage of Initial Capital: 1.16

Capital Attestation: Yes

**CAPITAL RESOURCES - ENTITIES**

No records found

**BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES**

Business Interest in Other State 1

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

Owner First Name:

Owner Last Name:

Owner Suffix:

Entity Legal Name: PharmaCann Inc.

Entity DBA:

Entity Description: Cannabis cultivation center

Entity Phone:  
815-584-9822

Entity Email:  
compliance@pharmacannis.com

Entity Website:

Entity Address 1: 28479 E. 3200 North Road

Entity Address 2:

Entity City: Dwight

Entity State: IL

Entity Zip Code: 60420

Entity Country: USA

Entity Mailing Address 1: 1200 E. Mazon Street

Entity Mailing Address 2: Suite A

Entity Mailing City:  
Dwight

Entity Mailing State: IL

Entity Mailing Zip Code:  
60420

Entity Mailing Country:  
USA

Business Interest in Other State 2

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

Owner First Name:

Owner Last Name:

Owner Suffix:

Entity Legal Name: PharmaCann Inc.

Entity DBA: Verilife

**Entity Description:** Co-located Adult Use and Medical cannabis dispensary

**Entity Phone:** 630-264-0890 **Entity Email:**  
compliance@pharmacanniss.com

**Entity Website:**

**Entity Address 1:** 161 S. Lincolnway St

**Entity Address 2:** Suite 301

**Entity City:** North Aurora **Entity State:** IL

**Entity Zip Code:** 60542 **Entity Country:** USA

**Entity Mailing Address 1:** 161 S. Lincolnway St

**Entity Mailing Address 2:** Suite 301

**Entity Mailing City:** North Aurora **Entity Mailing State:** IL

**Entity Mailing Zip Code:** 60542 **Entity Mailing Country:** USA

**Business Interest in Other State 3**

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

**Owner First Name:** **Owner Last Name:**

**Owner Suffix:**

**Entity Legal Name:** PharmaCann Inc.

**Entity DBA:** PharmaCanniss Health & Wellness

**Entity Description:** Co-located Adult Use and Medical cannabis dispensary

**Entity Phone:** 815-324-9189 **Entity Email:**  
compliance@pharmacanniss.com

**Entity Website:**

**Entity Address 1:** 4104 North Columbus Street

**Entity Address 2:** Unit B

**Entity City:** Ottawa **Entity State:** IL

**Entity Zip Code:** 61350 **Entity Country:** USA

**Entity Mailing Address 1:** 4104 North Columbus Street

**Entity Mailing Address 2:** Unit B

**Entity Mailing City:** Ottawa **Entity Mailing State:** IL

**Entity Mailing Zip Code:** 61350 **Entity Mailing Country:** USA

**Business Interest in Other State 4**

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

**Owner First Name:** **Owner Last Name:**

**Owner Suffix:**

**Entity Legal Name:** PharmaCann Inc.

**Entity DBA:** Verilife

**Entity Description:** Co-located Adult Use and Medical cannabis dispensary

**Entity Phone:** 847-755-2992 **Entity Email:**  
compliance@pharmacanniss.com

**Entity Website:** www.verilife.com

**Entity Address 1:** 1816 S Arlington Heights Rd

**Entity Address 2:**

**Entity City:** Arlington Heights **Entity State:** IL

**Entity Zip Code:** 60005 **Entity Country:** USA

**Entity Mailing Address 1:** 1816 S Arlington Heights Rd

**Entity Mailing Address 2:**

**Entity Mailing City:** Arlington Heights **Entity Mailing State:** IL

**Entity Mailing Zip Code:** 60005 **Entity Mailing Country:** USA

**Business Interest in Other State 5**

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

**Owner First Name:** **Owner Last Name:**

**Owner Suffix:**

**Entity Legal Name:** PharmaCann of New York, LLC

**Entity DBA:**

**Entity Description:** Medical cannabis cultivation center

**Entity Phone:** 845-207-0074 **Entity Email:**  
compliance@pharmacanniss.com

**Entity Website:**

**Entity Address 1:** 600 Neelytown Road

**Entity Address 2:**

**Entity City:** Montgomery **Entity State:** NY

**Entity Zip Code:** 12549 **Entity Country:** USA

**Entity Mailing Address 1:** 600 Neelytown Road

**Entity Mailing Address 2:**

**Entity Mailing City:** **Entity Mailing State:** NY

**Entity Mailing Zip Code:** **Entity Mailing Country:**



Montgomery 12549 USA

Business Interest in Other State 6

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

Owner First Name: Owner Last Name: Owner Suffix:  
Entity Legal Name: PharmaCann of New York, LLC Entity DBA: Verilife  
Entity Description: Medical cannabis dispensary  
Entity Phone: Entity Email: Entity Website:  
716-636-0420 compliance@pharmacannis.com  
Entity Address 1: 25 Northpointe Parkway Entity Address 2: Suite 30  
Entity City: Amherst Entity State: NY Entity Zip Code: 14228 Entity Country: USA  
Entity Mailing Address 1: 25 Northpointe Parkway Entity Mailing Address 2: Suite 30  
Entity Mailing City: Entity Mailing State: NY Entity Mailing Zip Code: Entity Mailing Country:  
Amherst 14228 USA

Business Interest in Other State 7

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

Owner First Name: Owner Last Name: Owner Suffix:  
Entity Legal Name: PharmaCann of New York, LLC Entity DBA: Verilife  
Entity Description: Medical cannabis dispensary  
Entity Phone: Entity Email: Entity Website:  
518-459-2161 compliance@pharmacannis.com  
Entity Address 1: 10 Executive Park Drive Entity Address 2:  
Entity City: Albany Entity State: NY Entity Zip Code: 12203 Entity Country: USA  
Entity Mailing Address 1: 10 Executive Park Drive Entity Mailing Address 2:  
Entity Mailing City: Entity Mailing State: NY Entity Mailing Zip Code: Entity Mailing Country:  
Albany 12203 USA

Business Interest in Other State 8

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

Owner First Name: Owner Last Name: Owner Suffix:  
Entity Legal Name: PharmaCann of New York, LLC Entity DBA: Verilife  
Entity Description: Medical cannabis dispensary  
Entity Phone: Entity Email: Entity Website:  
718-842-2001 compliance@pharmacannis.com  
Entity Address 1: 405 Hunts Point Ave Entity Address 2:  
Entity City: Bronx Entity State: NY Entity Zip Code: 10474 Entity Country: USA  
Entity Mailing Address 1: 405 Hunts Point Ave Entity Mailing Address 2:  
Entity Mailing City: Bronx Entity Mailing State: NY Entity Mailing Zip Code: Entity Mailing Country:  
10474 USA

Business Interest in Other State 9

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

Owner First Name: Owner Last Name: Owner Suffix:  
Entity Legal Name: PharmaCann of New York, LLC Entity DBA: Verilife  
Entity Description: Medical cannabis dispensary

**Entity Phone:** 315-457-0425  
**Entity Email:** compliance@pharmacanniss.com  
**Entity Website:**

**Entity Address 1:** 642 Old Liverpool Road  
**Entity Address 2:**

**Entity City:** Liverpool **Entity State:** NY  
**Entity Zip Code:** 13088 **Entity Country:** USA

**Entity Mailing Address 1:** 642 Old Liverpool Road  
**Entity Mailing Address 2:**

**Entity Mailing City:** Liverpool **Entity Mailing State:** NY  
**Entity Mailing Zip Code:** 13088 **Entity Mailing Country:** USA

**Business Interest in Other State 10**

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

**Owner First Name:** **Owner Last Name:** **Owner Suffix:**

**Entity Legal Name:** PharmaCann Inc. **Entity DBA:** Verilife

**Entity Description:** Medical cannabis dispensary

**Entity Phone:** 708-919-5641  
**Entity Email:** compliance@pharmacanniss.com  
**Entity Website:**

**Entity Address 1:** 5544 Nicholson Lane  
**Entity Address 2:**

**Entity City:** Rockville **Entity State:** MD  
**Entity Zip Code:** 20852 **Entity Country:** USA

**Entity Mailing Address 1:** 5544 Nicholson Lane  
**Entity Mailing Address 2:**

**Entity Mailing City:** Rockville **Entity Mailing State:** MD  
**Entity Mailing Zip Code:** 20852 **Entity Mailing Country:** USA

**Business Interest in Other State 11**

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

**Owner First Name:** **Owner Last Name:** **Owner Suffix:**

**Entity Legal Name:** PharmaCann Penn LLC **Entity DBA:** Verilife

**Entity Description:** Medical cannabis dispensary

**Entity Phone:** 888-493-6066  
**Entity Email:** compliance@pharmacanniss.com  
**Entity Website:**

**Entity Address 1:** 4026 Main St.  
**Entity Address 2:**

**Entity City:** Philadelphia **Entity State:** PA  
**Entity Zip Code:** 19127 **Entity Country:** USA

**Entity Mailing Address 1:** 190 South LaSalle  
**Entity Mailing Address 2:** 29th Floor

**Entity Mailing City:** Chicago **Entity Mailing State:** IL  
**Entity Mailing Zip Code:** 60603 **Entity Mailing Country:** USA

**Business Interest in Other State 12**

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

**Owner First Name:** **Owner Last Name:** **Owner Suffix:**

**Entity Legal Name:** Midwest Compassion Center, Inc. **Entity DBA:** Verilife

**Entity Description:** Co-located Adult Use and Medical cannabis dispensary

**Entity Phone:** 708-919-5641  
**Entity Email:** compliance@pharmacanniss.com  
**Entity Website:** <https://www.midwestcompassion.org/>

**Entity Address 1:** 1335 Lakeside Drive  
**Entity Address 2:** #4

**Entity City:** Romeoville **Entity State:** IL  
**Entity Zip Code:** 60446 **Entity Country:** USA

**Entity Mailing Address 1:** 1335 Lakeside Drive  
**Entity Mailing Address 2:**

**Entity Mailing City:** Romeoville **Entity Mailing State:** IL  
**Entity Mailing Zip Code:** 60446 **Entity Mailing Country:** USA



Entity Address 1: 875 Upland Ave. Entity Address 2:  
Entity City: Chester Entity State: PA Entity Zip Code: 19013 Entity Country: USA  
Entity Mailing Address 1: 875 Upland Ave. Entity Mailing Address 2:  
Entity Mailing City: Chester Entity Mailing State: PA Entity Mailing Zip Code: 19013 Entity Mailing Country: USA

Business Interest in Other State 17

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

Owner First Name: Owner Last Name: Owner Suffix:  
Entity Legal Name: PharmaCann Penn Plant LLC Entity DBA:  
Entity Description: Provisional Grower Processor License  
Entity Phone: 888-493-6066 Entity Email: compliance@pharmacann.com Entity Website:  
Entity Address 1: 104 Life Science Drive Entity Address 2:  
Entity City: Olyphant Entity State: PA Entity Zip Code: 18447 Entity Country: USA  
Entity Mailing Address 1: 104 Life Science Drive Entity Mailing Address 2:  
Entity Mailing City: Olyphant Entity Mailing State: PA Entity Mailing Zip Code: 18447 Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Stephen Last Name: Schuler Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. dba Verilife Business Type: Marijuana Retailer  
Marijuana Establishment City: Shrewsbury Marijuana Establishment State: MA

Individual 2

First Name: Stephen Last Name: Schuler Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. Business Type: Marijuana Cultivator  
Marijuana Establishment City: Holliston Marijuana Establishment State: MA

Individual 3

First Name: Norah Last Name: Scott Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. dba Verilife Business Type: Marijuana Retailer  
Marijuana Establishment City: Shrewsbury Marijuana Establishment State: MA

Individual 4

First Name: Norah Last Name: Scott Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. Business Type: Marijuana Cultivator  
Marijuana Establishment City: Holliston Marijuana Establishment State: MA

Individual 5

First Name: Michelle Last Name: Stormo Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. dba Verilife Business Type: Marijuana Retailer  
Marijuana Establishment City: Shrewsbury Marijuana Establishment State: MA

Individual 6

First Name: Michelle Last Name: Stormo Suffix:  
Marijuana Establishment Name: PharmaCannis Massachusetts Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Holliston

Marijuana Establishment State: MA

Individual 7

First Name: Daniel

Last Name: Tierney

Suffix:

Marijuana Establishment Name: PharmaCannis Massachusetts Inc. dba Verilife Business Type: Marijuana Retailer

Marijuana Establishment City: Shrewsbury

Marijuana Establishment State: MA

Individual 8

First Name: Daniel

Last Name: Tierney

Suffix:

Marijuana Establishment Name: PharmaCannis Massachusetts Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Holliston

Marijuana Establishment State:

MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 112 Main Street

Establishment Address 2:

Establishment City: Wareham

Establishment Zip Code: 02571

Approximate square footage of the establishment: 3500

How many abutters does this property have?: 5

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form-Executed-Adult Use application.pdf	pdf	5ae244b3b9c5f536005a78cb	04/26/2018
Plan to Remain Compliant with Local Zoning	Complying with local zoning.pdf	pdf	5ae3559747ddff7eac662ab9	04/27/2018
Community Outreach Meeting Documentation	Wareham Courier Legal Ad 3:22:18.pdf	pdf	5ae5bf564e185c0d9f42ae35	04/29/2018
Community Outreach Meeting Documentation	Notice- COMMUNITY OUTREACH HEARING.pdf	pdf	5ae5bf702654f0360aecf8d9	04/29/2018
Community Outreach Meeting Documentation	COH Flyer Submitted to BOS.pdf	pdf	5ae5cbaa1a56be7ea2dd0d15	04/29/2018
Community Outreach Meeting Documentation	Tear sheet from Wareham Week for COH.pdf	pdf	5ae5cbb7c357ae0da9a3e737	04/29/2018
Community Outreach Meeting Documentation	Agenda for Community Outreach Hearing.pdf	pdf	5ae76fe1423af335ecabb77a	04/30/2018
Community Outreach Meeting Documentation	Community Outreach Attestation form-INITIALED .pdf	pdf	5b2d039a5617f143c98bb4e1	06/22/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$340787.35

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload
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				Date
Plan for Positive Impact	Plan for Impacting Areas of Disproportionate Impact.pdf	pdf	5ade386ee459990d85449131	04/23/2018

### ADDITIONAL INFORMATION NOTIFICATION

**Notification:** I understand

### INDIVIDUAL BACKGROUND INFORMATION

#### Individual Background Information 1

**Role:** **Other Role:**  
**First Name:** Michelle **Last Name:** Stormo **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** no

#### Individual Background Information 2

**Role:** **Other Role:**  
**First Name:** Norah **Last Name:** Scott **Suffix:**  
**RMD Association:** RMD Owner  
**Background Question:** no

#### Individual Background Information 3

**Role:** **Other Role:**  
**First Name:** Stephen **Last Name:** Schuler **Suffix:**  
**RMD Association:** RMD Owner  
**Background Question:** yes

#### Individual Background Information 4

**Role:** **Other Role:**  
**First Name:** Daniel **Last Name:** Tierney **Suffix:**  
**RMD Association:** RMD Owner  
**Background Question:** yes

#### Individual Background Information 5

**Role:** **Other Role:**  
**First Name:** Jeremy **Last Name:** Unruh **Suffix:**  
**RMD Association:** RMD Staff  
**Background Question:** no

### ENTITY BACKGROUND CHECK INFORMATION

#### Entity Background Check Information 1

**Role:** Parent Company **Other Role:**  
**Entity Legal Name:** Pharmacann LLC **Entity DBA:** Pharmacannis  
**Entity Description:** Parent company of PharmaCannis Massachusetts Inc.  
**Phone:** 708-919-5641 **Email:** license@pharmannis.com  
**Primary Business Address 1:** 190 South LaSalle **Primary Business Address 2:** 29th Floor  
**Primary Business City:** Chicago **Primary Business State:** IL **Principal Business Zip:**

**Additional Information:** PharmaCann LLC was converted to PharmaCann Inc. in January 2020. This conversion was not the result of a change of ownership or control.

### Entity Background Check Information 2

**Role:** Other (specify) **Other Role:** Management Company  
**Entity Legal Name:** Pharmacann Mass LLC **Entity DBA:**  
**Entity Description:** Massachusetts Limited Liability Company  
**Phone:** 617-535-7720 **Email:** anuciforo@nuciforo.com  
**Primary Business Address 1:** One International Place **Primary Business Address 2:** Suite 1400  
**Primary Business City:** Boston **Primary Business State:** MA **Principal Business Zip Code:** 02110  
**Additional Information:**

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Certificate of Good Standing- MA DOR.pdf	pdf	5ad64b4cfe11f335e6a968cd	04/17/2018
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing- MA Sec of State.pdf	pdf	5ad64be41a56be7ea2dd0218	04/17/2018
Articles of Organization	Articles of Organization- Brighton Health Advocates, Inc..pdf	pdf	5ad7684841df29361e475209	04/18/2018
Articles of Organization	Articles of Entity Conversion.pdf	pdf	5ad768546d28ab7e8e788816	04/18/2018
Bylaws	Pharmacannis Massachusetts Signed Bylaws.pdf	pdf	5ad79e9dd7af757e748203b3	04/18/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	SOS - Good Standing PHARMACANNIS MASSACHUSETTS INC..pdf	pdf	5f4fd2335837b61c2f646db7	09/02/2020
Department of Revenue - Certificate of Good standing	MA DOR - Cert of Good Standing 09.03.20 (2).pdf	pdf	5f6a53855f18f707b2befd89	09/22/2020
Department of Unemployment Assistance - Certificate of Good standing	MA DUA - Cert of Good Standing 09.22.20.pdf	pdf	5f6a53879193d007a2193ab1	09/22/2020

**Massachusetts Business Identification Number:** 001317349

**Doing-Business-As Name:** Veri Life

**DBA Registration City:** Wareham

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Business Plan	Massachusetts Recreational Application - Business Plan.pdf	pdf	5ad64ec047a84a7e843c352e	04/17/2018
Plan for Liability Insurance	MA Adult Use Insurability Letter (2).pdf	pdf	5ad762f1d7af757e7482030f	04/18/2018
Proposed Timeline	Proposed Timeline for achieving operation.pdf	pdf	5ade39066d28ab7e8e788d20	04/23/2018

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for obtaining MJ or MJ products.pdf	pdf	5adb4590ccedc435f6f6a8c0	04/21/2018
Separating recreational from medical operations, if applicable	Separation of Medical and Recreational.pdf	pdf	5ade02347cc84f3628fdab14	04/23/2018
Personnel policies including background checks	HRSOP 1 Employee Files (Adult Use 4%2F17%2F18).pdf	pdf	5ade2138b9c5f536005a74da	04/23/2018
Personnel policies including background checks	HRSOP 2 Background Checks (Adult Use 4_17_2018).pdf	pdf	5ade213a4e185c0d9f42a9c1	04/23/2018
Personnel policies including background checks	SECSOP 3 (Adult Use 4_17_2018).pdf	pdf	5ade216609fa3e0db3eebfee	04/23/2018
Quality control and testing	Lab Testing.doc.pdf	pdf	5ae218e1d16c987e98c1bba4	04/26/2018
Maintaining of financial records	Mass Financial Records - Adult-Use App.pdf	pdf	5ae345c6e459990d85449564	04/27/2018
Inventory procedures	Inventory Procedures(6:27:18).pdf	pdf	5b33eb1e07462b506437a722	06/27/2018
Personnel policies including background checks	Personnel Policies.pdf	pdf	5b33eb30480890506ed9baa7	06/27/2018
Quality control and testing	Quality Control and Testing Procedues (6:27:18).pdf	pdf	5b33eb3f63f5ba502c34477e	06/27/2018
Quality control and testing	LABSOP1 7%2F3%2F18.pdf	pdf	5b3e2d66a208e331ed150e65	07/05/2018
Dispensing procedures	MA_DSPOSOP 3_Dispensary General Operations.pdf	pdf	5d013e1a13edb917cc1fd701	06/12/2019
Dispensing procedures	MA_DSPOSOP 19_Hours of Operation.pdf	pdf	5d013e5a69291617ba86052f	06/12/2019
Dispensing procedures	MA_DSPOSOP 16_Product Recall.pdf	pdf	5d013e5bc70e2b132b3155c5	06/12/2019
Dispensing procedures	DSPSOP 3 (Adult Use 4_17_18).pdf	pdf	5d0142ac69291617ba860542	06/12/2019
Personnel policies including background checks	MA-ALL-DSP-002-Sanitation _ Hygiene.pdf	pdf	5f4d1b2a87ec2b07e9c52dde	08/31/2020
Restricting Access to age 21 and older	MA-ALL-DSP-003-General Operations (1).pdf	pdf	5f4d1c209438190840926509	08/31/2020
Qualifications and training	MA-ALL-DSP-004-Dispensary Employee Training (non-management employees) .pdf	pdf	5f4d1c221e17f807ff96be1b	08/31/2020
Qualifications and training	MA-ALL-DSP-005- Dispensary Management .pdf	pdf	5f4d1c243595ff084fed67f0	08/31/2020
Personnel policies including background checks	MA-ALL-DSP-001-Best Practices for Hand Washing.pdf	pdf	5f4d1c26f6d8f5082e448dc9	08/31/2020



Personnel policies including background checks	MA-ALL-DSP-002-Sanitation _ Hygiene.pdf	pdf	5f4d1c2787ec2b07e9c52de2	08/31/2020
Energy Compliance Plan	MA-ALL-DSP-003-General Operations (1).pdf	pdf	5f4d1c9c87ec2b07e9c52de6	08/31/2020
Dispensing procedures	MA-ALL-DSP-007- Dispensing Procedures (1).pdf	pdf	5f4d1cb83595ff084fed67fa	08/31/2020
Restricting Access to age 21 and older	MA-ALL-DSP-008-Receiving Area Protocol.pdf	pdf	5f4d1cbacc687b07b2614433	08/31/2020
Restricting Access to age 21 and older	MA-ALL-DSP-010-Restrictions on Dispensary Access.pdf	pdf	5f4d1cbcdaa09e087b8a051e	08/31/2020
Quality control and testing	MA-ALL-DSP-006- Dispensing Error Quality Assurance Plan.pdf	pdf	5f4d1cc0233f7b0865383a56	08/31/2020
Inventory procedures	MA-ALL-DSP-013- Preventing Excess Inventory.pdf	pdf	5f4d1d785fa28707f4582f01	08/31/2020
Prevention of diversion	MA-ALL-DSP-014 Restricted Access and Vault Controls.pdf	pdf	5f4d1d7c9438190840926514	08/31/2020
Security plan	MA-ALL-DSP-015 Dispensary Cash Transfer.pdf	pdf	5f4d1d813595ff084fed6800	08/31/2020
Storage of marijuana	MA-ALL-DSP-011-Product Storage.pdf	pdf	5f4d1d83cc687b07b2614439	08/31/2020
Storage of marijuana	MA-ALL-DSP-012-Day Storage Process.pdf	pdf	5f4d1d84f6d8f5082e448dd5	08/31/2020
Inventory procedures	MA-ALL-DSP-017-Weekly and Quarterly Inventory Audit Process.pdf	pdf	5f4d1dccf6d8f5082e448ddd	08/31/2020
Prevention of diversion	MA-ALL-DSP-018-Reporting Incidents and Theft.pdf	pdf	5f4d1dce87ec2b07e9c52df0	08/31/2020
Security plan	MA-ALL-DSP-019-Counterfeit SOP Process.pdf	pdf	5f4d1dcf4fa1b607d3b6243d	08/31/2020
Record Keeping procedures	MA-ALL-DSP-020-Record Keeping Practices.pdf	pdf	5f4d1dd05fa28707f4582f05	08/31/2020
Inventory procedures	MA-ALL-DSP-016-Receipt of Cannabis Products.pdf	pdf	5f4d1dd21e17f807ff96be29	08/31/2020
Maintaining of financial records	MA-ALL-DSP-020-Record Keeping Practices.pdf	pdf	5f4d1ddd6d8f5082e448de1	08/31/2020
Quality control and testing	MA-ALL-DSP-022- Recall Process and Adverse Events.pdf	pdf	5f4d1fc5971c7c07c0437267	08/31/2020
Inventory procedures	MA-ALL-DSP-023- Cannabis Waste.pdf	pdf	5f4d1fc73a4447086ca993e6	08/31/2020
Qualifications and training	MA-ALL-DSP-024 Advertising.pdf	pdf	5f4d1fc95330a107b966e50d	08/31/2020
Security plan	MA-ALL-DSP-025- Disaster Relief Plan.pdf	pdf	5f4d1fca4fa1b607d3b62449	08/31/2020
Inventory procedures	MA-ALL-DSP-021-Product Returns and Abandoned Products.pdf	pdf	5f4d1fcc9fd04f085a978f43	08/31/2020
Security plan	MA-ALL-DSP-027-General Security Protocols.pdf	pdf	5f4d1fe61e17f807ff96be35	08/31/2020
Security plan	MA-ALL-DSP-028-Dispensary Worker Shift Security.pdf	pdf	5f4d1fe7f6d8f5082e448dfd	08/31/2020
Security plan	MA-ALL-DSP-029-Workstation Security Controls.pdf	pdf	5f4d1fe987ec2b07e9c52e02	08/31/2020

Security plan	MA-ALL-DSP-030-Alarm Activation.pdf	pdf	5f4d1fea233f7b0865383a79	08/31/2020
Security plan	MA-ALL-DSP-026-Dispensary Security Product Storage and Vault Controls.pdf	pdf	5f4d1feb7116b407de6558ff	08/31/2020
Security plan	MA-ALL-DSP-031-CCTV Maintenance.pdf	pdf	5f4d20011e17f807ff96be39	08/31/2020
Security plan	MA-ALL-DSP-032-Grand Opening Crowd Control.pdf	pdf	5f4d2002daa09e087b8a0541	08/31/2020
Diversity plan	MA-ALL-DSP-034-Diversity Plan.pdf	pdf	5f4d200487ec2b07e9c52e06	08/31/2020
Transportation of marijuana	MA-ALL-DSP-033-Medical Cannabis Home Delivery.pdf	pdf	5f4d2383b18f5e08358c8a5a	08/31/2020

### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Pharmacannis Adequate Patient Supply Policies and Procedures.pdf	pdf	5f4d6d4e233f7b0865383c33	08/31/2020

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	PharmaCann Substitution Policies and Procedures.pdf	pdf	5f4d6d544fa1b607d3b62659	08/31/2020

### 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 Agree

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

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

### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

### COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Please see the attached

report.

#### COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Please see the attached report.

#### HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 9:00 PM
Tuesday From: 9:00 AM	Tuesday To: 9:00 PM
Wednesday From: 9:00 AM	Wednesday To: 9:00 PM
Thursday From: 9:00 AM	Thursday To: 9:00 PM
Friday From: 9:00 AM	Friday To: 9:00 PM
Saturday From: 9:00 AM	Saturday To: 9:00 PM
Sunday From: 9:00 AM	Sunday To: 9:00 PM

## Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

### Applicant

I, Michelle Stormo, (*insert name*) certify as an authorized representative of Pharmacannis Massachusetts Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Wareham (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on April 26, 2018 (*insert date*).

Michelle M. Stormo

Signature of Authorized Representative of Applicant

### Host Community

I, Derek Sullivan, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Wareham (*insert name of host community*) to certify that the applicant and Wareham (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on April 26, 2018 (*insert date*).

[Signature]

Signature of Contracting Authority or  
Authorized Representative of Host Community



April 26, 2018

**Plan to Remain Compliant with Local Zoning**

Pharmacannis Massachusetts Inc.

Pharmacannis Massachusetts Inc.(PCM) is operating a Registered Marijuana Dispensary at the proposed site of the Retail Marijuana Dispensary and is compliant with all local Zoning. In 2015, the Town of Wareham zoned RMDs in the Institutional Zone. Since the passage of Recreational Marijuana, Wareham has zoned Marijuana Establishments in both the Institutional and Industrial zones. If required, PCM will obtain a special permit to operate a Retail Marijuana Establishment in Wareham. PCM will continue to work with the Town of Wareham on maintaining compliance with local zoning and has established a good working relationship with Town Officials.



# Legal Notices

**15 MALLARD ROAD  
LEGAL NOTICE  
NOTICE OF  
MORTGAGEE'S SALE OF  
REAL ESTATE**

By virtue and in execution of the Power of Sale contained in a certain mortgage given by William J. Harris Jr. and Sonya Harris to Household Finance Corporation II dated April 25, 2006, recorded at the Plymouth County Registry of Deeds in Book 32633, Page 105; said mortgage was then assigned to U.S. Bank Trust, N.A., as Trustee for LSP8 Master Participation Trust by virtue of an assignment dated July 16, 2014, and recorded in Book 44556, Page 78; of which mortgage the undersigned is the present holder for breach of conditions of said mortgage and for the purpose of foreclosing the same will be sold at PUBLIC AUCTION at 10:00 AM on April 4, 2018, on the mortgaged premises. This property has the address of 15 Mallard Road, Wareham, MA 02571. The entire mortgaged premises, all and singular, the premises as described in said mortgage: THE LAND IN WAREHAM, PLYMOUTH COUNTY, COMMONWEALTH OF MASSACHUSETTS, BEING SHOWN AS LOT NO. 100 ON PLAN ENTITLED 'SUBDIVISION OF GATEWAY SHORES AT WAREHAM OWNED BY GATEWAY SHORES, INC. DATED FEBRUARY 21, 1967. MODIFIED MARCH 21, 1967. WALTER E. ROWLEY & ASSOCIATES, SURVEYORS, RECORDED WITH THE PLYMOUTH COUNTY REGISTRY OF DEEDS AS PLAN NO. 275 ON APRIL 28, 1967. BEING BOUND-ED AND DESCRIBED, IN ACCORDANCE WITH SAID PLAN, AS FOL-LOWS: SOUTHEASTERLY BY MALLARD ROAD, ONE HUNDRED ONE (101) FEET; SOUTHWESTERLY BY LOT 101, NINETY-FOUR (94) FEET; NORTH-WESTERLY BY LOTS 88 AND 89. ONE HUNDRED THIRTEEN AND 2/100 (113.02) FEET; AND NORTHEASTERLY BY LOT 99, NINETY-FOUR (94) FEET CONTAINING, ACCORDING TO SAID PLAN, 10,058 SQUARE FEET OF LAND, MORE OR LESS. THIS CONVEYANCE IS SUBJECT TO AND WITH THE BENEFITS OF ALL EASEMENTS, RESTRICTIONS, RESE-

possession, building and zoning laws, encumbrances, condominium liens, if any and all other claim in the nature of liens, if any there be. In the event that the successful bidder at the foreclosure sale shall default in purchasing the within described property according to the terms of this Notice of Sale and/or the terms of the Memorandum of Sale executed at the time of foreclosure, the Mortgagee reserves the right to sell the property by foreclosure deed to the second highest bidder, providing that said second highest bidder shall deposit with the Mortgagee's attorneys, the amount of the required deposit as set forth herein. If the second highest bidder declines to purchase the within described property, the Mortgagee reserves the right to purchase the within described property at the amount bid by the second highest bidder. The foreclosure deed and the consideration paid by the successful bidder shall be held in escrow by DG&L, (hereinafter called the "Escrow Agent") until the deed shall be released from escrow to the successful bidder at the same time as the consideration is released to the Mortgagee, whereupon all obligations of the Escrow Agent shall be deemed to have been properly fulfilled and the Escrow Agent shall be discharged. Other terms, if any, to be announced at the sale. Dated: March 2, 2018 U.S. Bank Trust, N.A., as Trustee for LSP8 Master Participation Trust by its Attorney DOONAN GRAVES & LONGORIA, LLC, 100 Cummings Center, Suite 225D, Beverly, MA 01915 (978) 921-2670 www.dgandl.com 53636 (HARRIS, JR.)

AD#13666493  
Wareham Courier 3/8,  
3/15, 3/22/18

**1 HUNTER AVENUE  
LEGAL NOTICE  
COMMONWEALTH OF  
MASSACHUSETTS**



LAND COURT  
DEPARTMENT OF THE  
TRIAL COURT

**3/29/18 COMMUNITY  
OUTREACH HEARING  
LEGAL NOTICE  
COMMUNITY OUTREACH  
HEARING  
Adult Use of Marijuana**

Date: 3/29/18  
Time: 6pm-7pm  
Location: Wareham  
Historical Society, 495  
Main Street, Wareham,  
MA 02571

Presented by:  
Pharmacannis  
Massachusetts Inc. (for-  
merly Brighton Health  
Advocates, Inc.)  
Dispensary Address: 112  
Main Street, Wareham,  
MA 02571

AD#13670283  
Wareham Courier 3/22/18

**14 SWIFT AVENUE  
LEGAL NOTICE  
COMMONWEALTH OF  
MASSACHUSETTS**

PLYMOUTH, ss.

**SUPERIOR COURT  
DEPARTMENT  
OF THE TRIAL COURT  
CIVIL ACTION:  
1883CV00275**

To Scott Onanian a/k/a  
Scott B. Onanian  
and to all persons entitled  
to the benefit of the  
Servicemembers Civil  
Relief Act as amended.

Rockland Trust Company  
claiming to be the holder of  
a mortgage covering real  
property situated in  
Wareham in said County of  
Plymouth on Swift Avenue  
and numbered 14, given by  
Scott B. Onanian and  
Jennifer A. Cogswell to  
Mortgage Electronic  
Registrations Systems, Inc.  
as nominee for Rockland  
Trust Company dated  
March 23, 2007 and  
recorded with Plymouth  
County Deeds, Book 34276  
Page 147 has filed with  
said court a complaint for  
authority to foreclose said  
mortgage in the following  
manner, to wit: by entry  
and possession and by the  
exercise of a power of sale  
contained in said mortgage.

If you are entitled to the  
benefits of the  
Servicemembers Civil  
Relief Act and amendments  
thereto and you object to  
the foreclosure of said  
mortgage, you or your  
attorney should file a writ-  
ten appearance and answer  
in said court at Plymouth  
on or before April 30th,  
2018, or you may be fore-

title reference see deed  
recorded with said Registry  
of Deeds in Book 29972,  
Page 46.

The premises are to be sold  
subject to and with the ben-  
efit of all easements,  
restrictions, building and  
zoning laws liens, attor-  
ney's fees and costs pur-  
suant to M.G.L.Ch.183A,  
unpaid taxes, tax titles,  
water bills, municipal liens  
and assessments, rights of  
tenants and parties in pos-  
session.

**TERMS OF SALE:**  
A deposit of FIVE THOU-  
SAND DOLLARS AND 00  
CENTS (\$5,000.00) in the  
form of a certified check,  
bank treasurer's check or  
money order will be  
required to be delivered at  
or before the time the bid is  
offered. The successful  
bidder will be required to  
execute a Foreclosure Sale  
Agreement immediately  
after the close of the bid-  
ding. The balance of the  
purchase price shall be paid  
within thirty (30) days from  
the sale date in the form of  
a certified check, bank treas-  
urer's check or other  
check satisfactory to  
Mortgagee's attorney. The  
Mortgagee reserves the  
right to bid at the sale, to  
reject any and all bids, to  
continue the sale and to  
amend the terms of the sale  
by written or oral  
announcement made before  
or during the foreclosure  
sale. If the sale is set aside  
for any reason, the  
Purchaser at the sale shall  
be entitled only to a return  
of the deposit paid. The  
purchaser shall have no  
further recourse against the  
Mortgagor the Mortgagee  
or the Mortgagee's attor-  
ney. The description of the  
premises contained in said  
mortgage shall control in  
the event of an error in this  
publication. **TIME WILL  
BE OF THE ESSENCE.**

Other terms if any to be  
announced at the sale.

Wells Fargo Bank, N.A.

Present Holder of said  
Mortgage,  
By Its Attorneys,  
ORLANDS PC  
PO Box 540540  
Waltham, MA 02454  
Phone: (781) 790-7800  
15-008479

AD#13669407  
Wareham Courier 3/22,  
3/29, 4/5/18

**137 LAKE AVENUE  
LEGAL NOTICE  
COMMONWEALTH OF  
MASSACHUSETTS**



LAND COURT  
DEPARTMENT OF THE  
TRIAL COURT

18 SM 000954

**ORDER OF NOTICE**

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

Santander Bank, N.A.,  
formerly known as  
Sovereign Bank N.A., for-  
merly known as  
Sovereign Bank claiming  
to have an interest in a  
Mortgage covering real  
property in Wareham,  
numbered 137 Lake  
Avenue, given by  
Alexander F. Paulo to  
Sovereign Bank, dated  
June 15, 2007, Registered  
with Plymouth County  
Registry District of the  
Land Court as Document  
Number 623899 noted on  
Certificate of Title Number  
110664, and now held by  
Plaintiff as successor by  
merger, has/have filed with  
this court a complaint for  
determination of  
Defendant's/Defendants'  
Servicemembers status.

If you now are, or recently  
have been, in the active  
military service of the  
United States of America,  
then you may be entitled to  
the benefits of the  
Servicemembers Civil  
Relief Act. If you object to  
a foreclosure of the above-  
mentioned property on that  
basis, then you or your  
attorney must file a written  
appearance and answer in  
this court at Three  
Pemberton Square,  
Boston, MA 02108 on or  
before April 16, 2018 or  
you will be forever barred  
from claiming that you are  
entitled to the benefits of  
said Act.

Witness, JUDITH C. CUT-  
LER Chief Justice of this  
Court on February 28,  
2018

Attest:  
Deborah J. Patterson  
Recorder

# BRIEFS

From Page A7

12-4 p.m., and is free to the Expo has been to include 40 in the Rosebr Center. Town will showcase nary delights tions strategi throughout th offering comp hors d'oeuvre and music by attendees will complimenta compliments Apparel & Pro have chances the day to win door prizes. V space is \$250. at www.cape chamber.org Paula Taylor a 6000, extensi

**Thrift Shop Madness sale**

WAREHAM to New Thrift hold its "March winter clearan Friday, April 6 urday, April 7, a.m. to 2 p.m. Patrons can fil 13-gallon plas winter clothin for \$5 per bag Shop is locate Ave., Wareham Congregation: downstairs in land Thacher Hall (across fr green.) There ing. Call the cl at 508-295-16 tions or questi ceeds from the go to the First tional Church munity service

**Showstoppers: vacation progr**

MATTAPON istrations are r accepted for S pers' 14th Ann Vacation Perc Program to be





## COMMUNITY OUTREACH HEARING

### Adult Use of Marijuana

**Date: 3/29/18**

**Time: 6pm-7pm**

**Location: Wareham Historical Society, 495 Main Street,  
Wareham, MA 02571**

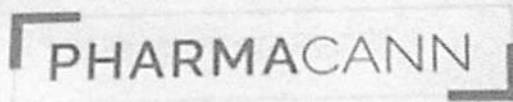
**Presented by: Pharmacannis Massachusetts Inc. (formerly  
Brighton Health Advocates, Inc.)**

**Dispensary Address: 112 Main Street, Wareham, MA 02571**









RECEIVED  
MAR 29 2018  
TOWN OF WAREHAM  
BOARD OF SELECTMEN

**COMMUNITY OUTREACH HEARING**  
Adult Use of Marijuana

**Date:** 3/29/18

**Time:** 6pm-7pm

**Location:** Wareham Historical Society, 495 Main Street,  
Wareham, MA 02571

**Presented by:** Pharmacannis Massachusetts Inc. (formerly  
Brighton Health Advocates, Inc.)

**Dispensary Address:** 112 Main Street, Wareham, MA 02571

**APRIL 9, 2018 WAREHAM FIRE DISTRICT ANNUAL MEETING WARRANT**

Continued from page 20

Article #23 continued	Operating Budget - FISCAL YEAR		
	Proposed 2019	Voted 2018	Increase (Decrease)
Water Treatment Plant Operation	28,000.00		
<b>Total Other Charges &amp; Expenses</b>	<b>\$58,200.00</b>	\$29,700.00	\$28,500.00
<b>Insurance &amp; Benefits:</b>			
Liability Insurance	\$90,500.00	\$90,500.00	
Bond Issue Expense	50,000.00	25,000.00	
Interest & Maturing Debt Water	1,266,761.00	843,725.00	
Group Insurance	567,100.00	530,000.00	
Medicare/FICA	16,675.00	16,350.00	
Audit	10,000.00	10,000.00	
Water Reserve	50,000.00	40,000.00	
Interest & Maturing Debt Betterments	736,245.00	761,710.00	
Plymouth County Retirement Assoc.	265,148.00	269,885.00	
Town of Wareham Clerical & Admin.	46,179.00	41,835.00	
<b>Total Insurance &amp; Benefits</b>	<b>\$3,098,608.00</b>	\$2,629,005.00	\$469,603.00
Salaries & Wages	1,126,700.00	1,103,700.00	
Consumable Supplies	340,500.00	337,500.00	
Services, Other Exp. & Ins.	3,940,808.00	3,146,806.00	
<b>Total Water Department Budget</b>	<b>5,408,008.00</b>	4,588,006.00	\$820,002.00

Inserted by the Board of Water Commissioners Vote: 3-0-0  
Prudential Committee Voted Favorable Action: 4-0-0

To choose the following officers: Two (2) members of the Prudential Committee for three (3) years, and one (1) Water Commissioner for three (3) years. The above mentioned officers are to be voted for on one ballot. The polls will be open at the Wareham Fire District, 2550 Cranberry Highway, Wareham, Massachusetts at ten o'clock a.m. on Saturday, April 14, 2018 and shall be closed at four o'clock p.m. You are hereby directed to serve this warrant by posting in six or more public places in the District or who by direction of the Prudential Committee cause a copy of the Warrant to be published in a newspaper published in the town, if any, otherwise in a newspaper published in the County, in an issue or issues immediately preceding the date of the meeting.

Hereof fail not and make due return of the Warrant with doings thereon to the District Clerk at the time and place of said meeting. Given into our hands at Wareham this twenty second day of March in the year, 2018.

ATT. True Copy:  
Constable

**A TRUE COPY ATTEST:**  
Wendy A. Lemieux  
District Clerk

**PRUDENTIAL COMMITTEE:**  
George T. Barrett, Chairman  
Kenneth J. Baptiste, Clerk  
Ronald A. Enos  
John Connolly, Jr.  
Richard H. England, Jr.

**LEGAL ADVERTISEMENTS**

**ZONING BOARD OF APPEALS**  
54 Marion Road  
Wareham, MA 02571

**NOTICE OF PUBLIC HEARING**

The Zoning Board of Appeals will hold a public hearing on April 11, 2018 at 6:30 p.m. in Room 320 of the Wareham Multi Service Center, 48 Marion Road, Wareham, MA 02571 to consider Petition #8-18 for a Variance from the requirements of Article 6 Table 621 of the Wareham Zoning By-Laws, to Bachant Builders, 9 Tyler Avenue, E. Wareham, MA 02538 seeking to resolve issues regarding a building constructed above the approved height, located at 17 Washburn Court, Wareham, MA (Assessors Map 134, Lots 1074 & 1075) in the MR-30 zoning district.

Nazih Elkallassi, Chairman

First Notice: March 22, 2018  
Second Notice: March 29, 2018

**COMMUNITY OUTREACH HEARING**  
Adult Use of Marijuana

Date: 3/29/18  
Time: 6pm-7pm  
Location: Wareham Historical Society, 495 Main Street, Wareham, MA 02571

Presented by: Pharmacannis Massachusetts Inc. (formerly Brighton Health Advocates, Inc.)  
Dispensary Address: 112 Main Street, Wareham, MA 02571

**APRIL 9, 2018 WAREHAM FIRE DISTRICT SPECIAL DISTRICT MEETING WARRANT**

COMMONWEALTH OF MASSACHUSETTS  
PLYMOUTH, SS  
WAREHAM, MASSACHUSETTS

Inserted by  
the Board of Water Commissioners: 3-0-0  
Prudential Committee  
Voted Favorable Action: 5-0-0

not anticipated in the budget.

Inserted by the Prudential Committee  
Prudential Committee  
Voted Favorable Action: 4-0-0

**WARRANT OF THE WAREHAM FIRE DISTRICT  
SPECIAL DISTRICT MEETING**

To the Constables of the Town of Wareham:

**Greetings:**

In the name of the Commonwealth of Massachusetts, you are hereby directed to notify and warn the legal voters of the Wareham Fire District, Wareham, Massachusetts, qualified to vote in Fire District affairs to meet in the Wareham High School Auditorium, Viking Drive, Wareham, Massachusetts on Monday evening, April 9, 2018 at seven o'clock p.m. to act on the following articles:

**Article 1:**  
To choose by ballot a moderator to preside at said meeting.  
Inserted by the Prudential Committee

**Article 3:**  
To see if the District will vote to raise and appropriate or transfer from available funds the sum of \$95,000.00 for unforeseen FY18 paving costs, or to act anything thereon, or thereunto

*Explanation: This Article is to fund unforeseen FY18 paving costs on Great Neck Road as a result of the service line transition project. The Town of Wareham Municipal Maintenance Department has enforced curb to curb paving on major water projects.*

Inserted by  
the Board of Water Commissioners: 3-0-0  
Prudential Committee  
Voted Favorable Action: 4-0-0

**Article 4:**  
To see if the District will vote to raise and appropriate or transfer from available funds a sum of \$50,000.00 to fund a Contractual Liabilities Account, or to act anything thereon, or thereunto

*Explanation: This Article is available at the discretion of the Prudential Committee to fund unforeseen costs of Retirement or separation of employment from the District and to fund obligations from mid-year contract negotiations*

**Article 5:**  
To see if the District will vote to transfer \$6,061.00 from the FY18 Fire Department Clerical Salaries budget line item to Career Officer's Salaries budget line item, or to act thereon, or thereunto

*Explanation: This Article is to authorize a transfer of funds between line items to correct an FY18 budgeting error.*

Hereof fail not and make due return of the Warrant with doings thereon to the District Clerk at the time and place of said meeting. Given into our hands at Wareham this twenty second day of March in the year, 2018.

ATT. True Copy:  
Constable

**A TRUE COPY ATTEST:**  
Wendy A. Lemieux  
District Clerk

**PRUDENTIAL COMMITTEE:**  
George T. Barrett, Chairman  
Kenneth J. Baptiste, Clerk  
Ronald A. Enos  
John Connolly, Jr.  
Richard H. England, Jr.

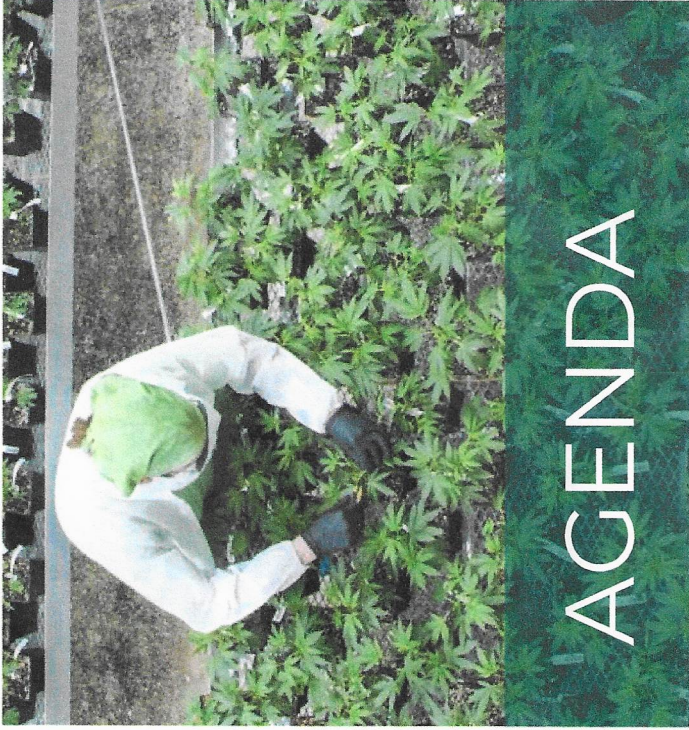
**Get daily  
Wareham  
headlines  
delivered to  
your in-box.**

Go to  
[www.WarehamVillageSoup.com](http://www.WarehamVillageSoup.com)

Scroll down to:



Enter your e-mail address  
and click "GO".



**Cannabis 101 - A basic overview**

**Proposal to locate a retail, adult use cannabis facility in Wareham at 112 Main Street**

**Provide information demonstrating the location will be maintained securely**

**Identify steps to prevent diversion to minors**

**Outline a plan to positively impact the community**

**Offer information to demonstrate that the location will not constitute a nuisance**

**Q & A**

COMMUNITY OUTREACH HEARING





## 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, Michelle Stormo, (*insert name*) attest as an authorized representative of Pharmacannis Massachusetts Inc. (*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 29, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on March 22, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on March 20, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on March 21, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

---

**Fwd: Information Request for license renewal- Verilife**

1 message

---

**Shelley Stormo** <shelley.stormo@pharmacann.com>  
Reply-To: shelley.stormo@verilife.com  
To: PharmaCann Compliance <compliance@pharmacann.com>

Fri, Aug 28, 2020 at 4:31 PM

----- Forwarded message -----

From: **Shelley Stormo** <shelley.stormo@pharmacann.com>  
Date: Fri, Aug 28, 2020 at 2:45 PM  
Subject: Information Request for license renewal- Verilife  
To: Kenneth Buckland <kbuckland@wareham.ma.us>, Derek Sullivan <dsullivan@wareham.ma.us>

Hi Ken and Derek,  
I hope all is well with you. I am attaching a letter requesting documentation of any costs the Town has incurred as a result of us operating in Wareham.  
Please review the attached letter and let me know if there were any costs incurred.

Thank you,  
Shelley

--

**Shelley Stormo, LMFT**

EAST COAST DISTRICT MANAGER

[112 Main Street | Wareham, MA 02571](#)[939 Boston Turnpike, Shrewsbury, MA 01545](#)[shelley.stormo@verilife.com](mailto:shelley.stormo@verilife.com) | 508.538.9070 | 508.649.9858

--

**Shelley Stormo, LMFT**

EAST COAST DISTRICT MANAGER

[112 Main Street | Wareham, MA 02571](#)[939 Boston Turnpike, Shrewsbury, MA 01545](#)[shelley.stormo@verilife.com](mailto:shelley.stormo@verilife.com) | 508.538.9070 | 508.649.9858

**Changing  
the way  
people  
view  
cannabis.**

PHARMACANNIS  
MASSACHUSETTS, INC  
112 MAIN STREET  
WAREHAM, MA 02571  
508.538.9070

**PHARMACANN**

August 28, 2020

SENT VIA EMAIL

Mr. Derek Sullivan and Mr. Ken Buckland  
Town of Wareham  
54 Marion Road  
Wareham, MA 02571

RE: Pharmacannis Massachusetts, Inc. d/b/a Verilife Retail Marijuana Establishment

Dear Mr. Sullivan and Mr. Buckland,

As you know, PharmaCannis Massachusetts, Inc. ("PharmaCann") d/b/a Verilife currently holds a Retail Marijuana Establishment License located at 112 Main Street in Wareham. Pursuant to 935 CMR 500.103(4), PharmaCann must submit an application for the annual renewal of its license to operate in Wareham from the Cannabis Control Commission ("CCC"). As a condition of that renewal, the CCC has required that we request from Wareham, our host community, the records of any cost to the city anticipated or actual, resulting from the operation of our Retail Marijuana Establishment.

In order to comply with this condition of our renewal, we are submitting to your office our formal request for records of any cost incurred by the Town of Wareham over the past year as a result of our operations. Please send any documentation to by mail and e-mail to:

Pharmacannis Massachusetts, Inc.  
Michelle Stormo - East Coast District Manager  
112 Main Street  
Wareham, MA 02571  
compliance@pharmacann.com

We thank you for your attention to this matter. Please do not hesitate to reach out should you have any questions.



Sincerely,

*Michelle Stormo*

Michelle Stormo  
East Coast District Manager

Changing  
the way  
people  
view  
Canada

August 28, 2020

REPLY VIA EMAIL

Mr. David Sullivan and Mr. Ken Buckland  
Town of Weymouth  
24 Main Road  
Weymouth, MA 02571

RE: Pharmacia Massachusetts, Inc. d/b/a Verrill Retail Marijuana Establishment

Dear Mr. Sullivan and Mr. Buckland,

As you know, Pharmacia Massachusetts, Inc. ("Pharmacia") and Verrill currently holds a Retail Marijuana Establishment License located at 115 Main Street in Weymouth, Massachusetts. Pharmacia must submit an application for the annual renewal of its license to operate in Weymouth from the Cannabis Control Commission ("CCC"). As a condition of that renewal, the CCC has required that we request from Weymouth, our host community, the records of any cost to the city anticipated or actual, resulting from the operation of our Retail Marijuana Establishment.

In order to comply with this condition of our renewal, we are submitting to your office our formal request for records of any cost incurred by the Town of Weymouth over the past year as a result of our operations. Please send any documentation to by mail and e-mail to:

Pharmacia Massachusetts, Inc.  
Michelle Stormo - East Coast District Manager  
115 Main Street  
Weymouth, MA 02571  
cmst@pharmacia.com

We thank you for your attention to this matter. Please do not hesitate to reach out should you have any questions.

---

**Information Request for license renewal- Verilife**

---

**Kenneth Buckland** <kbuckland@wareham.ma.us>  
To: "shelley.stormo@verilife.com" <shelley.stormo@verilife.com>  
Cc: Derek Sullivan <dsullivan@wareham.ma.us>

Tue, Sep 1, 2020 at 5:13 PM

Shelley

Hope you are doing well.

There is nothing in our Host Community Agreement that requires the town to pull together what would be an extensive and intensive record-generating procedure.

I am sorry but we don't have the available resources and have to decline your request at this time.

Ken

Kenneth Buckland

Director of Planning and Community Development

Town of Wareham

508.291.3100 x 6501

---

**From:** Shelley Stormo <shelley.stormo@pharmacann.com>**Sent:** Friday, August 28, 2020 3:45 PM**To:** Kenneth Buckland; Derek Sullivan**Subject:** Information Request for license renewal- Verilife

[Quoted text hidden]

**Disclaimer**

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).



4/23/18

Pharmacannis Massachusetts Inc. (PCM)

**Plan for Impacting Areas of Disproportionate Impact**

Pharmacannis Massachusetts Inc. (PCM) has forged relationships with local groups fighting addiction and providing outreach services to the community. A donation was made to assist Wareham Fighting Addiction to continue to run its weekly drop in centers and feed its volunteers. PCM will continue working with the community of Wareham, which has been identified by the Cannabis Control Commission as an area of disproportionate impact. In addition to working with local groups fighting addiction and providing outreach, we will direct funds and support to other areas that are identified by the community as problematic/underfunded.





## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



BRIGHTON HEALTH ADVOCATES  
81 TECHNOLOGY PARK DR  
EAST FALMOUTH MA 02536-4442

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

The Commissioner of Revenue certifies that, as of the date of this certificate, BRIGHTON HEALTH ADVOCATES 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?***

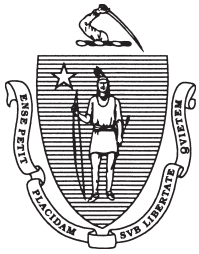
If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

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

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: March 12, 2018

To Whom It May Concern :

I hereby certify that according to the records of this office,

**PHARMACANNIS MASSACHUSETTS INC.**

is a domestic corporation organized on **March 12, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in cursive script that reads "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 18030249720

Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by:



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

Minimum Fee: \$35.00

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

[Special Filing Instructions](#)

**Articles of Organization**

(General Laws, Chapter 180)

**Federal Employer Identification Number:** 463307025 (must be 9 digits)

**ARTICLE I**

The exact name of the corporation is:

BRIGHTON HEALTH ADVOCATES INC.

**ARTICLE II**

The purpose of the corporation is to engage in the following business activities:

TO ENGAGE IN CIVIC, EDUCATIONAL, AND BENEVOLENT ACTIVITIES PER MGL CH. 180 §4

**ARTICLE III**

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

**ARTICLE IV**

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:

*(If there are no provisions state "NONE")*

1. MEETINGS OF MEMBERS, IF ANY, ARE AUTHORIZED TO TAKE PLACE ANYWHERE WITHIN THE UNITED STATES. 2. THE DIRECTOR MAY MAKE, AMEND, OR REPEAL THE BY-LAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY LAW, THE ARTICLES OF ORGANIZATION, OR THE BY-LAWS REQUIRE ACTION BY THE MEMBERS. 3. NO DIRECTOR SHALL BE PERSONALLY LIABLE TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED HOWEVER THAT THIS PROVISION SHALL NOT ELIMINATE THE LIABILITY OF A DIRECTOR, TO THE EXTENT THAT SUCH LIABILITY IS IMPOSED BY APPLICABLE LAW; A. FOR ANY BREACH OF THE DIRECTORS' DUTY OF LOYALTY TO THE CORPORATION. B. FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR KNOWING VIOLATION OF LAW; AND C. FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT.

Notes: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

### ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

### ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

08/14/2013

### ARTICLE VII

The information contained in Article VII is not a permanent part of the Articles of Organization.

**a. The street address (*post office boxes are not acceptable*) of the principal office of the corporation in Massachusetts is:**

No. and Street: 81 TECHNOLOGY PARK DR  
City or Town: EAST FALMOUTH State: MA Zip: 02536 Country: USA

**b. The name, residential street address and post office address of each director and officer of the corporation is as follows:**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	MICHELLE MARIE STORMO	33 PORTSIDE DR POCASSET, MA 02559 USA 33 PORTSIDE DR POCASSET, MA 02559 USA	December 2014
TREASURER	MICHELLE MARIE STORMO	33 PORTSIDE DR POCASSET, MA 02559 USA 33 PORTSIDE DR POCASSET, MA 02559 USA	December 2014
CLERK	HOLLY ELISABETH CARROLL	26 TROTting PARK RD FALMOUTH, MA 02536 USA 26 TROTting PARK RD FALMOUTH, MA 02536 USA	December 2014
VICE PRESIDENT	HOLLY ELISABETH CARROLL	26 TROTting PARK RD FALMOUTH, MA 02536 USA 26 TROTting PARK RD FALMOUTH, MA 02536 USA	December 2014
DIRECTOR	DAVID GLENN AUBREY	9 MALLARD WAY NORTH FALMOUTH, MA 02556 USA 9 MALLARD WAY NORTH FALMOUTH, MA 02556 USA	December 2014
DIRECTOR	OWEN JAY STORMO	430 TERRACE RD SANTA BARBARA, CA 93109 USA 430 TERRACE RD SANTA BARBARA, CA 93109 USA	December 2014
DIRECTOR	ROBERT S CARROLL	BOX 684 EAST LONGMEADOW, MA 01028 USA BOX 684 EAST LONGMEADOW, MA 01028 USA	December 2014

**c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:**  
December

**d. The name and business address of the resident agent, if any, of the business entity is:**



Name:

No. and Street:

City or Town:

State:

Zip:

Country:

**I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:**

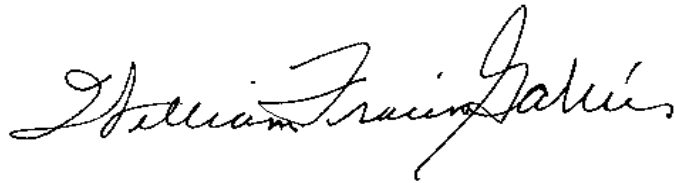
**IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 13 Day of August, 2013. (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)**

**MICHELLE MARIE STORMO**

THE COMMONWEALTH OF MASSACHUSETTS

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

August 13, 2013 08:54 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

D

# The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

## Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation (General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM II

Brighton Health Advocates, Inc. is a registrant  
with the Department of Public Health  
in accordance with 105 CMR 725.100(C)  
as of February 27, 2018.

*Bryan Harter*  
Bryan Harter  
Director

Medical Use of Marijuana Program  
Bureau of Healthcare Safety and Quality  
Massachusetts Department of Public Health

463307025

- (1) Exact name of the non-profit: Brighton Health Advocates, Inc.
- (2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:  
Pharmacannis Massachusetts Inc.
- (3) The plan of entity conversion was duly approved in accordance with the law.
- (4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

### ARTICLE I

The exact name of the corporation upon conversion is:

Pharmacannis Massachusetts Inc.

### ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:\*

To transact business as a marijuana establishment in accordance with Chapter 55 of the Acts of 2017, and to engage in the cultivation, processing, and sale of marijuana and marijuana infused products, and to engage in any other lawful business.

5

### ARTICLE III

State the total number of shares and par value, \* if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
Common	1,000			

### ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

All common shares shall have the same rights, privilege, preference, and priority.

### ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

None.

### ARTICLE VI

Other lawful provisions, and if there are no such provisions, this article may be left blank.

See attachment VI

*Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.*

## ATTACHMENT VI

- (a) **Personal liability of directors.** No director shall have personal liability to the corporation for monetary damages for breach of his or her fiduciary duty as a director notwithstanding any provision of law imposing such liability, provided that this provision shall not eliminate or limit the liability of a director: (i) for any breach of the director's duty of loyalty to the corporation or its shareholders; (ii) for acts of omissions not in good faith or which involve intentional misconduct or a knowing violation of law; (iii) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts; or (iv) for any transaction from which the director derived an improper personal benefit. Any repeal or modification of this provision, directly or indirectly, such as by adoption of an inconsistent provision of these Articles, shall not adversely affect any right or protection of a Director of the Corporation existing at the time of such repeal or modification.
- (b) **Authorization of directors to make, amend, or repeal bylaws.** The board of directors may make, amend or repeal the bylaws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D of the General Laws of Massachusetts, these Articles or the bylaws requires action by the shareholders.
- (c) **Shareholder action without a meeting by less than unanimous consent.** Action required or permitted by Chapter 156D of the General Laws of Massachusetts to be taken at a shareholders' meeting may, pursuant to Section 7.04 of Chapter 156D, be taken without a meeting by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting.
- (d) **Shareholder vote required to approve matters acted on by shareholders.** The affirmative vote of a majority of all the shares eligible to vote on a matter shall be sufficient for the approval of the matter, notwithstanding any greater vote on the matter otherwise required by any provision of Chapter 156D of the General Laws of Massachusetts.
- (e) **Minimum number of directors.** The board of directors may consist of one or more individuals, notwithstanding the number of shareholders.

**ARTICLE VII**

The effective date of organization of the corporation is the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than the 90th day after the articles are received for filing:

**ARTICLE VIII**

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:  
465 Hopping Brook Road, Holliston, MA 01746
- b. The name of its initial registered agent at its registered office:  
Teddy Scott
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Teddy Scott

Treasurer: Teddy Scott

Secretary: Teddy Scott

Director(s): Teddy Scott

- d. The fiscal year end of the corporation:  
December 31
- e. A brief description of the type of business in which the corporation intends to engage:  
Marijuana Establishment
- f. The street address of the principal office of the corporation:  
1010 Lake Street, Floor 2, Oak Park, IL 60301
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

465 Hopping Brook Road, Holliston, MA 01746, which is  
*(number, street, city or town, state, zip code)*

- its principal office;
- an office of its transfer agent;
- an office of its secretary/assistant secretary;
- its registered office.

Signed by: Michelle M. Stamo,  
*(signature of authorized individual)*

- Chairman of the board of directors,
- President,
- Other officer,
- Court-appointed fiduciary,

on this 22<sup>nd</sup> day of February, 2018



COMMONWEALTH OF MASSACHUSETTS

SECRETARY OF THE COMMONWEALTH

William Francis Galvin  
Secretary of the Commonwealth  
One Ashburton Place, Boston, Massachusetts 02108-1512

2018 MAR 12 AM 11:44

CORPORATION'S DIVISION

**Articles of Entity Conversion of a  
Domestic Non-Profit with a Pending Provisional or  
Final Certification to Dispense Medical Use Marijuana  
to a Domestic Business Corporation**  
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$ 475 having been paid, said articles are deemed to have been filed with me this 12 day of March, 2018, at 11:44 0 a.m./p.m.  
*time*

Effective date: \_\_\_\_\_  
(must be within 90 days of date submitted)

  
WILLIAM FRANCIS GALVIN  
Secretary of the Commonwealth

SB  
Examiner  
DB  
Name approval

Filing fee: Minimum \$250

2668

TO BE FILLED IN BY CORPORATION  
Contact Information:

\_\_\_\_\_  
C  
\_\_\_\_\_  
M

Andrea F. Nuciforo, Jr.

One International Place, Suite 1400

Boston, MA 02110

Telephone: (617) 535-7720

Email: anuciforo@nuciforo.com

Upon filing, a copy of this filing will be available at [www.sec.state.ma.us/cor](http://www.sec.state.ma.us/cor). If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

1307168

**BYLAWS**  
**PHARMACANNIS MASSACHUSETTS, INC.**

Article I: Offices

Section 1. Principal Office. The principal office of the Corporation shall be 1010 Lake Street, 2<sup>nd</sup> Floor, Oak Park, Illinois, 60301.

Section 2. Other Offices. The Board of Directors may establish branch or subordinate offices at any time and at any place.

Article II: Purpose

To make cannabis products available to qualified patients and their personal caregivers in a safe, healthy, and clean environment that complies with the laws of The Commonwealth of Massachusetts and the directives of the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission. Additionally, the purpose includes providing palliative and other services to qualified patients, as well as educational materials regarding the potential benefits and dangers associated with the use of medical marijuana. As permitted by law, the Corporation may engage in any and all activities in furtherance of, related to, or incidental to these purposes.

Article III: Shareholders

Section 1. Annual Meeting. A meeting will be held annually for the purpose of electing members of the Board of Directors (the "Directors") of the Corporation and for transacting such other business as may come before the meeting. The annual meeting will be held on a date and time designated by the Board of Directors.

Section 2. Special Meetings. Special meetings of the Shareholders may be called at any time by the Board of Directors, by the President, or by Shareholders entitled to cast in total not less than 50 percent of the votes at that meeting. If a special meeting becomes called by anyone other than the Board of Directors, the person calling the meeting will make a written request to the Corporation specifying the time and date of the meeting and the general nature of the business proposed to be transacted.

Section 3. Place of Meeting. Shareholders' meetings will be held at any place within or outside the Commonwealth of Massachusetts at a place to be determined at the Board of Directors discretion. If no designation of the location gets made for any annual or special meeting of the Shareholders, the meetings shall be held at the corporation's principal place of business.

Section 4. Notice. Written notice of any Shareholder meeting will be given not less than 10 days before the date of the meeting to each Shareholder entitled to vote at that meeting. The notice shall state the place, date, and hour of the meeting. If, for a special meeting, the notice shall state the purpose of the meeting. A mailed notice is effective when deposited in the United States mail with postage prepaid and the proper address of the Shareholder as appearing on the records of the corporation.

Section 5. Quorum and Required Vote. A majority of the outstanding voting shares, whether represented in person or by proxy, shall constitute a quorum entitled to take action at a meeting of

Shareholders. Without a quorum, a majority of the represented Shareholders may adjourn the meeting to another time without further notice.

Section 6. Consent of Shareholders in Lieu of Meeting. Any action to be taken at any annual or special meeting of Shareholders may be taken without a meeting, without prior notice, and without a vote, if a signed consent in writing, setting forth the action so taken, gets presented by the holders of outstanding shares having not less than the minimum number of shares that would be necessary to authorize or pass such an action were a meeting otherwise called and all votes cast.

#### Article IV: Directors

Section 1. Powers. The Board of Directors will manage the business and affairs of the Corporation by or under the Board.

Section 2. Number and Tenure. The Board will consist of one or more Directors, all of whom shall be natural persons who shall be elected for a term of three years. Each Director shall hold office until a successor becomes elected and qualified. Directors do not need to be Shareholders. Any Director may resign at any time upon notice given in writing to the Corporation. The authorized number of Directors will be one (1) until changed by a duly adopted amendment to the Bylaws adopted by the vote or written consent of a majority of the outstanding Shareholders.

Section 3. Vacancies. A vacancy in the Board of Directors will exist if a Director resigns, dies, or becomes removed by the Shareholders; or when a court of appropriate jurisdiction declares the Director of unsound mind or enters a felony conviction against a Director; or when the authorized number of Directors increases.

Section 4. Regular Meetings. By resolution, the Board may give the time and place, either within or outside the Commonwealth of Massachusetts, for the holding of regular Board meetings without any notice other than that of the resolution.

Section 5. Special Meetings. Special meetings of the Board of Directors may be called for any purpose at any time by the Chairman of the Board, the President, or a majority of Directors.

Section 6. Quorum. A majority of the authorized number of Directors will be considered a quorum to transact business.

Section 7. Notice of Meetings. Any regular meeting of the Board may be held without notice of the date, time, and place of the meeting. Any special meeting of the Board may be preceded by at least a two (2)-day notice of the date, time, and place of the meeting. The Board may give this notice personally, by mail, facsimile, electronic mail, or by any other method allowed by law. Notice is effective at the earliest of: (a) receipt; (b) delivery to the proper address or telephone number as shown in the Corporation's records; or (c) five (5) days after its deposit in the United States mail, with postage prepaid and the correct address noted.

Section 8. Waiver of Notice. Notice of a meeting need not be given to any Director who signs a written waiver delivered to the Corporation for inclusion in the minutes or for filing with the corporate records.



Section 9. Action by Directors Without A Meeting. Any action required or permitted to be taken at a meeting of the Board may be taken without a meeting if all members of the Board consent to it in writing.

Section 10. Presence through Communications Equipment. Unless otherwise provided by law or by the articles of organization, Directors may participate in any meeting of the board of Directors by means of a conference telephone or similar electronic or communications equipment by mean of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

#### Article V: Officers

Section 1. Officers. The Officers of the Corporation will consist of the President, the Treasurer, and the Secretary. Officers shall be elected for three years and shall hold office until their successors become elected and qualified. An appointee may hold one or more offices. Teddy Scott shall initially serve as President, Treasurer and Secretary.

Section 2. Removal and Resignation. Any Officer or agent appointed by the Board may be removed by the Board at any time with or without cause. Any Officer may resign at any time by giving written notice to the Corporation.

Section 3. Vacancies. The Board may fill a vacancy due to resignation, removal, disqualification, death, or otherwise.

Section 4. President. The President shall preside at all meetings of Shareholders and Directors, have the general management and supervision of the affairs of the Corporation, and shall perform all other duties as determined by the Board.

Section 5. Treasurer. The Treasurer shall have the custody of all moneys and securities of the corporation and shall keep accurate financial records for the Corporation.

Section 6. Secretary. The Secretary shall issue notices for all meetings except for notices for special meetings of the Shareholders and special meeting of the Directors; shall prepare the minutes of the meetings of the Shareholders and meetings of the Board; and shall keep a record of Shareholders at the principal office.

#### Article VI: Liability

Section 1. No Personal Liability. The directors and the officers of the Corporation shall not be personally liable for any debt, liability or obligation of the Corporation for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law for acts or omissions not in good faith or which involve intentional misconduct, recklessness, or a knowing violation of the law.

Section 2. Corporate Obligations. All persons, corporations or other entities extending credit to, contracting with, or having any claim against, the Corporation, may look only to the funds and property of the Corporation for the payment of any such contract or claim, or for the payment of any debt,

damages, judgment or decree, or of any money that may otherwise become due or payable to them from the Corporation.

Section 3. Indemnification. The Corporation shall, to the extent legally permissible, indemnify any person serving or who has served at any time as a director, executive director, president, vice president, treasurer, assistant treasurer, clerk, assistant clerk or other officer of the Corporation, or at its request as a director or officer of any organization, or at its request in any capacity with respect to any employee benefit plan, and may indemnify an employee or other agent who has so served, against all liabilities and expenses, including, without limitation, amounts paid in satisfaction of judgments, in compromise or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer, except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith; provided, however, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless such compromise and indemnification shall be approved by a majority vote of the Board.

#### Article VII: Amendments

These Bylaws may be adopted, altered, amended or repealed, in whole or in part, by a two-thirds (2/3) vote of a majority of the directors then in office.

#### Article VIII: Powers

Section 1. Statement of Powers. By and through the Board, the Corporation shall have the power to do any and all lawful acts which may be necessary or convenient to affect the purpose for which the Corporation is organized, and to assist other organizations or persons whose activities further accomplish, foster or attain such purposes. The Corporation shall have the power to lease, sell, mortgage, transfer, in such manner and on such terms as they may deem advisable, all property, real or personal; to acquire, by purchase or otherwise, and retain for whatever period they shall think proper, all kinds of real and personal property and every kind of investment, including cash, securities and other property; to execute agreements and contract in furtherance of the business of the Corporation; to settle, compromise or pay any claims, including taxes, in accordance with law; to secure, hold and maintain municipal and state licenses and permits; to collect rents and other proceeds from real estate not specifically devised and to pay all carrying charges thereon and make such repairs thereto as they deem proper without the necessity of obtaining leave of any court.

Section 2. Investments. The Corporation shall have the right to retain all or any part of any securities or property acquired by it in whatever manner, and to invest and reinvest any funds held by it, according to the judgment of the Directors, without being restricted to the class of investments, provided, however, that no action shall be taken by or on behalf of the Corporation if such action is a prohibited transaction under Massachusetts law.

Section 3. Loans. No moneys shall be borrowed on behalf of the Corporation and no evidences of such indebtedness shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.



Section 4. Deposits. All funds of the Corporation, not otherwise employed, shall be deposited from time to time to the credit of the Corporation in such banks, investment firms or other depositories as the Board of Directors shall select.

Section 5. Audits. Within three (3) months after the close of the Corporation's fiscal year, the Corporation will prepare reviewed financial statements in accordance with generally accepted accounting principles (GAAP) and make these statements available to all Shareholders and, if required by law, to the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission.

Section 6. Insurance. The Corporation may purchase and maintain insurance (including but not limited to insurance for legal expenses and costs incurred in connection with defending any claim, proceeding or lawsuit) on behalf of any person who is or was a director, officer, employee, fiduciary or agent of the Corporation or who, while serving in this role, is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee, fiduciary or agent of any other foreign or domestic Corporation, partnership, joint venture, trust, employee benefit plan, or other enterprise, against any liability asserted against him or incurred by him in any such capacity, or arising out of his status as such. In addition, the Corporation shall maintain liability insurance coverage in compliance with 105 CMR 725.105(Q), or any other provision of Massachusetts law or regulation.

#### Article IX: Anti-Trust Policy

The Corporation shall comply fully with all federal and state antitrust laws which prohibit companies from working together to restrict competition. The Corporation and its directors and officers are informed about antitrust laws and recognize possible antitrust issues or questions. While competitors in the Massachusetts medical marijuana industry may collaborate, such competitors may not unlawfully restrict competition within the industry. The Corporation shall not engage in any anti-competitive activities. Furthermore, to ensure against inadvertent violations of applicable antitrust laws and except to ensure that prices are affordable for the Corporation's patients, and to prevent diversion for non-medical purposes, directors, officers and employees shall not discuss with competitors:

1. Pricing strategies for medical marijuana or related products and services;
2. Establishment of market monopolies for products or services;
3. Refusal to deal with a company because of pricing or distribution practices for medical marijuana or related products or services;
4. Strategies or plans to give business or remove business from a specific company.

Furthermore, directors, officers, and employees shall not engage in any actions or understandings arising in the context of the Corporation's activities which appear to be anti-competitive in purpose or inconsistent with this policy.

#### Article X: Severability

The invalidity or unenforceability of any provisions of these Bylaws shall not affect the validity or enforceability of any other provision of these Bylaws, which shall remain in full force and effect.



Article XI: Dissolution

Dissolution of the Corporation will comply with Massachusetts law. The Directors may authorize a petition for the dissolution of the Corporation. A two-thirds vote will be required for such dissolution. Articles of Dissolution will be filed with the Massachusetts Secretary of State. All outstanding annual reports will be filed with the Secretary of State. A letter to the Massachusetts Department of Revenue on the Corporation's letterhead will be sent stating that the Corporation is dissolving. All outstanding business will be completed. All outstanding debts will be paid, and all assets transferred or liquidated in accordance with law. Any remaining funds in the Corporation will be distributed as per the direction of the directors at the meeting authorizing the dissolution.

In the event that the dissolution also requires one or more marijuana establishment locations to close, cease conducting business or dissolve, the board of directors shall vote to take the following actions: (i) written notice to the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission; (ii) written notice to patients and caregivers via mail, or in-person if the opportunity arises to notify the patient or caregiver arises prior to the closing of the doors of the Corporation's place of business; (iii) any remaining cannabis product will be destroyed at the close of business, and disposed of in a manner consistent with 105 CMR 725.000 et seq. and with the policies and procedures of the RMD.

As set forth above, these Bylaws have been adopted by a vote of the Board as per Article VII and affirmed by the President of the Corporation on this 2nd day of April 2018.

  
\_\_\_\_\_  
Teddy Scott  
President

## **Executive Summary**

PharmaCann Mass LLC is a wholly-owned subsidiary of PharmaCann LLC (“PC” or “Company”). PC has over 170 employees operating 11 marijuana facilities and serving thousands of patients and customers in highly regulated states. PC is led by a management team experienced with simultaneously constructing multiple locations across the country and operationalizing dispensaries within 6 months of license award. A demonstrated capability to execute is important for both the Company and its Board.

PC was founded in 2014 by a group of mission driven individuals with backgrounds in health care, law, and finance. As marijuana was beginning to be recognized as a viable alternative for patients suffering from debilitating conditions, the founders saw a need to bring a science-based, professional approach to the marijuana industry. While many companies are led by “ganjapreneurs,” PC was formed with a mission of being a thought leader devoted to helping marijuana find its rightful place in healthcare, whatever that may be. PC does not rely on consultants or non-employee advisors. Instead, PC has grown organically around a core of objective, data-driven professionals with backgrounds in chemical engineering, pharmaceutical research, healthcare, horticulture, retail operations management, logistics, information technology, accounting, finance, regulatory compliance, and law. In a relatively short period of time, PC has grown to be one of the country’s leading marijuana organizations.

**Products:** PC’s facilities will offer whole flower marijuana, marijuana-infused products such as tinctures, salves, edible options and cooking mediums, as well as ancillary accessory and storage products.

### **Services:**

**Vision:** PC’s vision is to become the highest-quality and safest marijuana dispensary in the country.

**Mission:** Establish the gold standard dispensary and the industry standard transparent operating model while maintaining the needs of customers with safe, high-quality products.

## **Company Ownership and Management Structure**

PC is structured as a limited liability company with its wholly-owned subsidiary in Massachusetts, which provides the highest level of compliance, transparency, and accountability to regulators, accountants, and financial institutions. PC is managed by its Board of Managers, which consists of the CEO and the Executive Director. The CEO is the senior corporate officer in charge of managing PC. Reporting to the CEO is a leadership team consisting of the Director of Operations, the Director of Finance, the Director of Human Resources, and Director of New Markets. The leadership team meets on a bi-weekly basis to ensure that PC’s operations are aligned with corporate strategy. Reporting to the leadership team is an operational team of 12 functional and production leaders across the firm, including the Director of Process Engineering, the Director of Research and Development, the Director of IT Infrastructure, and the General Counsel.

## **Financial Plan**

PC believes ample access to capital combined with prudent financial management are necessary to provide an uninterrupted supply of marijuana in a safe and compliant facility. PC has already incurred a majority of the costs needed to operationalize its facility to provide marijuana, but for any other costs or expansions required, PC can rely on its substantial operations that are already generating cash flow, its significant cash balance (\$20.5 million as of 12/31/17), and the ample sources of additional capital it maintains. However, PC fully intends to build and maintain financially and operationally sound recreational dispensaries in Massachusetts that could not only survive but thrive on their own, if needed.

**Funding from Internal Operations:** In addition to the assets on its balance sheet, PC will utilize funds generated internally from its rapidly expanding operations as a source of capital. PC expects revenues generated from its existing operations already contribute positively to its overall cash position.

**Fundraising History:** The success of PC to date can be attributed not only to its strategy and operational excellence, but also to its ability to quickly raise significant amounts of capital. PC has already raised \$130 million in capital through a variety of sources, as set forth below. All of the sources of capital available to PC are currently available, and will remain available, to PC to fund any dispensary-related expenses in Massachusetts.

	<b>\$ MM's</b>
Priced equity round I (9/2014)	\$20.4
Priced equity round II (5/2015)	5.0
Priced equity round III (7/2015)	15.3
Convertible note I (9/2016)	23.8
Sale / leaseback transaction (12/2016)	30.0
Convertible note II (11/2017)	20.0
Priced equity round IV (as of 12/13/2017)	15.5
<b>Total capital / cash raised as of 12/13/2017</b>	<b>\$130.5</b>



April 11, 2018

Mr. Teddy Scott  
 PharmaCann LLC  
 1010 Lake Street, 2<sup>nd</sup> Floor  
 Oak Park, IL 60301

RE: MA Adult Use License – Insurance Requirements

Dear Teddy,

For consolidated PharmaCann, LLC and PharmaCannis Massachusetts, Inc.. please accept this letter as notice of insurability for the state of Massachusetts and Adult Use as applies to the following:

Coverage Line	Effective Dates	Insurer	Limits	MA Adult Use Placement Available
Workers Compensation	3/1/18 – 3/1/19	Redwood Fire & Casualty	\$1M/1M/1M Employers Liability Statutory Work Comp	Yes
General Liability (includes Product Liability)	9/22/17 – 9/22/18	Evanston Insurance	\$1M Per Occurrence \$2M Aggregate \$5,000 Deductible Applies	*Working to obtain underwriting approval
Excess Liability	9/22/17 – 9/22/18	Kinsale Insurance	\$5M Per Occurrence & Aggregate	*Working to obtain underwriting approval
Auto Liability	12/3/17 – 12/3/18	Progressive Insurance	\$1M Combined Single Limit	Yes
Commercial Property	9/22/17 – 9/22/18	Hallmark Specialty Insurance	Varies by location	Yes

\*Adult Use/Recreational Use is a new exposure, and we are in the process of obtaining underwriting acceptance and coverage quotations for this exposure. All insurance policies in force currently cover Medical Use. New policies may be obtained in addition to, or replacement of, the current General & Excess Liability policies upon completion of underwriting review.

Sincerely,

Miranda Leininger, CTC, AIC, AIS, CISR, CRIS  
 Senior Account Manager  
 p 847.463.7889 f 847.440.9127  
 mleininger@assuranceagency.com



4/21/18

Pharmacannis Massachusetts, Inc. (PCM)

### **Plan for separating Medical from Recreational Sales**

PCM will co-locate its Medical and Adult Use Retail dispensary site at 112 Main Street, Wareham, MA 02571. Before entering the dispensary, consumers must display valid photo identification proving they are 21 years of age or older.

Medical and adult use consumers will be checked into the retail dispensary through creating a profile for them at the front desk. Medical patients will be checked into one virtual "queue" while adult use consumers will be checked into another "queue." Both medical and adult use consumers will be offered educational material and an intake form to fill out. Medical and adult use consumers will be asked to read and sign a safety form that lists warnings, prohibits use on the premises as well as while operating a motor vehicle or heavy machinery.

Once checked in, consumers will be directed to enter the dispensing area and browse the menu. A Consult Room is also available for private conversations and cannabis education.

There is a natural separation in the dispensary- one side of the wall has two registers and one side has three registers. Upon entering the dispensing area, medical patients will be served at the first two registers, closest to the bathrooms and Consult Room. Adult Use consumers will be served at the registers to the right of the divider, which will be clearly designated as Adult Use registers through signage.

Patient Care Representatives (PCR) will call the next consumer up to the register from the virtual queue, check their identification, take their order,

and process payment.

The POS software will apply all applicable taxes to the sale if the consumer is an Adult Use consumer.

PCM will store both adult use and medical cannabis in the vault and will ensure that 35% of inventory is designated for medical patients. Any necessary physical or virtual separation of products can occur either in the vault or through our software.







<b>STANDARD OPERATING PROCEDURE</b>					
<b>PharmaCannis Massachusetts Inc.</b>	<b>Employee Files</b>				<b>HRSOP 1</b>
<b>Issued:</b>	<b>4/17/2018</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>4/16/2018</b>
<b>Issued to:</b>	<b>GM DOP</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To ensure best practices in maintaining both active and inactive employee files at Pharmacannis.

**PRIVACY AND ACCESS:** To prevent any unauthorized individuals from viewing employee files. To ensure that employee files are maintained and kept up to date.

**INSTRUCTIONS:**

The General Manager (GM) is in charge of ensuring that employee files are in a locked cabinet at all times. The GM will audit employee files monthly and ensure that the following are in each file:

1. Copy of everything submitted to the Cannabis Control Commission (CCC) in regards to the employee, including the application for agent cards
2. National Practitioner Databank Self-query response
3. Background check reports obtained in accordance with 935 CMR 500.030(2)
4. Signed Job Description that includes duties, authority, responsibilities, qualifications and supervision
5. I-9 Paperwork
6. Signed Employment Agreement
7. Reference, Education and Professional License checks (Completed by Creative Services, Inc. and listed on the CORI report)
8. Documentation of verification of references
9. Proof of required 8 hours of annual employee training, including training regarding privacy, confidentiality requirements, and Responsible Vendor Training pursuant to 935 CMR 500.105(2)(b) and the signed statement of the individual indicating the date, time,

and place he or she received said training and the topics discussed,, including the name and title of the presenter

10. Periodic Performance Evaluations
11. A record of any disciplinary action taken
12. In a file separate from general personnel records, all CORI Reports obtained in accordance with 105 CMR 725.030(C), M.G.L. c. 6, s. 172 and 803 CMR 2.00 will be stored, along with fingerprinting results.
13. Personnel records for each dispensary agent will be retained for at least 12 months after termination of the individuals affiliation with the Retail Adult use dispensary, or the length of time the CCC deems necessary, whichever is greater.
14. Following closure of an Retail dispensary, all records will be kept for at least 2 years at the expense of Pharmacannis Massachusetts in a form and location acceptable to the CCC.

**ATTACHMENTS**

- None

**REVISION HISTORY**

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>



<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts Inc.</b>	<b>Background Checks</b>				<b>HRSOP 2</b>
<b>Issued:</b>	<b>4/17/2018</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>4/16/2018</b>
<b>Issued to:</b>	<b>DOP DHR</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To implement background checks for new employees to ensure compliance and safety.

**INSTRUCTIONS:**

1. Following receipt of a resume through Smart Recruiter, the Hiring Manager will screen applicants online and indicate to Human Resources (“HR”) whether the candidate appears desirable.
2. If the Hiring Manager indicates that they like the candidate’s experience, HR will schedule and conduct a phone screen with the candidate.
3. Based on the phone screen, HR will recommend an in person interview or recommend that Pharmacann not pursue the applicant.
4. HR will schedule an in person interview with the Hiring Manager and at least one other individual.
5. If the in-person interview goes well, HR will make an offer of employment to the candidate, contingent on a background check.
6. If the candidate accepts the job offer, the candidate will receive the following instructions from HR:

Your manager will contact you to set up an **onsite** appointment to return your **3 completed background check forms** as well as the **National Practitioner Data Bank results**.

Print and complete the following attached background check forms:

- Release & Authorization Form – This form does NOT need to be notarized
- Disclosure and Acknowledgment Form – This form does NOT need to be notarized

- DCJIS iCORI Acknowledgment Form – Complete **page 1** of this form.
  - Page 2 of this form **must be completed by an employee of our Registered Marijuana Dispensary (RMD) during your onsite appointment. You must bring a valid form of government identification to your appointment, such as a State ID or Driver’s License, and provide the last 6 digits of your Social Security number (if you have one) for our RMD employee to complete page 2.**

**OR**

- Page 2 of this form **can be completed remotely but, if doing so, MUST BE NOTARIZED.** Should you choose to complete this form remotely, you may email all completed forms back directly to [hr@pharmacannis.com](mailto:hr@pharmacannis.com) in lieu of coming onsite for an appointment to return the forms. In addition, you must submit a self-query to the National Practitioner Data Bank (see instructions below) and also return the results “Response to Your Self-Query” page and your payment receipt to [hr@pharmacannis.com](mailto:hr@pharmacannis.com).

**Instructions for National Practitioner Data Bank (NPDB) Requirement:**

1. Visit the NPDB website: <https://www.npdb.hrsa.gov/ext/selfquery/SQHome.jsp>
2. Start your Self-Query by clicking on “Start a new order”
3. Select “Personal” on the first screen and continue the steps filling out as much information as possible
4. Follow the steps for Payment and Identify Verification (the query costs \$4 which will be reimbursed to you on your first paycheck. Please bring your receipt to your onsite appointment. If you are completing the forms remotely, please email the receipt to [hr@pharmacannis.com](mailto:hr@pharmacannis.com))
5. Results will be emailed and mailed to the addresses you provide
6. Print results (“Response to Your Self-Query” page) and bring to your onsite appointment along with the 3 background check forms and your payment receipt.
7. Candidate will also provide an Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
8. Once the background checks results have been received and the employee is deemed suitable for the position, the prospective employee’s references will be checked by Pharmacann’s background check vendor, Creative Services, Inc.
9. If the references check out, the prospective employee will be hired and the Principal will order an agent card for the employee so that work may begin.

10. HR will complete all functions necessary to register the employee with Paycor and access all benefits, including health, dental and life insurance.

**ATTACHMENTS**

- None

**REVISION HISTORY**

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>



<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts Inc.</b>	<b>Background Checks Control</b>				<b>SECSOP 3</b>
<b>Issued:</b>	<b>4/17/2018</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>4/16/2018</b>
<b>Issued to:</b>	<b>DHR</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To instruct hiring personnel in the requirement for background checks.

**PRODUCT SAFETY:** None.

**INSTRUCTIONS:**

1. Prior to beginning employment with PharmaCann, each and every principal officer, board member, employee or agent of PharmaCann must provide to the Director of Human Resources (“DHR”) the following:
  - a. Verification of the applicant’s place of full residency.
  - b. A sworn statement that he or she has not been convicted of an excluded offense in any jurisdiction.
  - c. Any further identification information needed to conduct a background check. For example, all forms necessary for Creative Services, Inc. to run the background check.
2. The applicant must successfully pass a background check that verifies that the applicant has not been convicted of an excluded offense.
3. Directors, couriers, security employees and other employees or agents who work in sensitive areas (e.g., conduct security controls, audit controls, handle cash, etc.) will undergo an additional background check, which may include a credit history check, conducted by an external background investigation agent retained by PharmaCann.

4. This will include a thorough investigation of their past employment history and include relevant criminal history checks.

5. The results of this background check will be reported to the Human Resources Hiring staff for review and consideration prior to permitting access to work at PharmaCann and clearance into restricted areas.

**ATTACHMENTS:**

- Incident report form

**REVISION HISTORY**

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>

# Sample Incident Reporting Form

Name: \_\_\_\_\_  
\_\_\_\_\_

Department: \_\_\_\_\_

Date Reported: \_\_\_\_\_  
\_\_\_\_\_

Type of Incident: \_\_\_\_\_

Description:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Incident Classification: \_\_\_\_\_

Action Taken:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Department/Law Enforcement Contacted: [Y/N]

Who: \_\_\_\_\_

When: \_\_\_\_\_

Direction: \_\_\_\_\_

Resolution:

- Escalated
- Open
- Closed

Date Resolved: \_\_\_\_\_

By whom: \_\_\_\_\_

<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts Inc.</b>	<b>Cannabinoid Profiling and Contaminant Screening</b>				<b>LABSOP 1</b>
<b>Issued:</b>	<b>4/26/18</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>4/25/18</b>
<b>Issued to:</b>	<b>All employees</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To set and define the standard operating procedure to identify and quantify the cannabinoid makeup of dried cannabis, cannabis extract, and cannabis product formulations, and to screen for contaminants including Heavy Metals, Pesticides and Mold/Fungus.

**PRODUCT SAFETY:** None.

**INSTRUCTIONS:**

1. This procedure applies to all PharmaCannis Massachusetts (PCM) Dispensaries.
2. Definitions:
  - a. Independent Testing Laboratory: Any lab certified by the Cannabis Control Commission (CCC) for the testing of adult use marijuana and marijuana products and accredited to the International Organization for Standardization 17025 (ISO/IEC 17025: 2017) by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved by the Commission and independent financially from any RMD in Massachusetts.
  - b. Laboratory Agent: Any Laboratory agent registered with the CCC pursuant to 935 CMR 500.050(7) who is determined to be suitable for registration.
  - c. Batch: Cannabis that was grouped together for testing by the licensed cultivator or manufacturer.
3. As PCM will be receiving marijuana and marijuana products from licensed cultivators, the following procedures will be followed:
4. Upon receipt of wholesale cannabis orders, the General Manager, along with one other designated employee, will receive the order and ensure that all mandatory testing was

completed at an Independent Testing Laboratory in accordance with 935 CMR 500.160.

- a. If there is any question about compliance, lab test results will be requested and obtained.
  - b. Any wholesale agreement with a licensed cultivator or manufacturer who fails to test marijuana or marijuana products to the standard set by the CCC will be terminated immediately.
  - c. Marijuana or marijuana products that have not been lab tested will be refused.
5. A written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) shall be implemented by the Director of Operations
- a. This policy shall include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

## ATTACHMENTS

· None

## REVISION HISTORY

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>



A foundational requirement for quality assurance and compliance is an IT Group and a robust IT infrastructure. The Company's IT Group is led a Director of IT Infrastructure who manages a team of three IT professionals. The IT Group is responsible for designing, implementing, and maintaining the Company's IT systems, and also providing user support to the Company's 190 employees. The Company has invested more than \$500,000 developing its Enterprise Resource Planning ("ERP") platform using the Microsoft Dynamics Nav 2017 platform which aggregates records from across the Company's 160+ employee organization in a consolidated Standard Query Language ("SQL") database. The ERP operates in parallel with the ITS, and both are scalable to operations in Ohio. The ERP provides the Company with seamless integration of different business functions, including financial management, banking compliance, supply chain management, customer relationship management, warehouse and inventory management, and logistics. The ERP will also automate various back office functions to ensure all of its records are kept efficiently and accurately.

The Company has adopted sound accounting policies for establishing and maintaining internal control that, among other things, initiates, records, processes, and reports transactions, as well as events and conditions, of the business.

Business records, which include records of assets and liabilities, monetary transactions, journals, ledgers, and supporting documents, agreements, checks, invoices, salaries and wages, bonuses, and detailed sales records are kept digitally on a secure server. Security over these digital records is maintained by the IT Group and access granted only with approval of the Controller or Director of Finance. Controls are in place to ensure that personnel only have access to the records appropriate for their position.

The high level of control and accuracy of these policies allows the financial statements of the Company to be audited by a licensed and nationally-respected independent accounting firm. As part of the annual audit, the following records are maintained by the Company and reviewed by the independent accounting firm:

- records that clearly reflect all financial transactions and the financial condition of the business, including contracts for services performed or received that relate to the Company
- Purchase invoices, bills of lading, manifests, sales records, copies of bills of sale, and any supporting documents, including the items and/or services purchased, from whom the items were purchased, and the date of purchase
- Bank statements and canceled checks for all accounts relating to the Company
- Accounting and tax records related to the Company and all its investors

Upon finalization of these financial statements, they will be kept both by the independent auditor and the Company on a secure server, but records will be made available for inspection upon request by the Commission.

<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts, Inc.</b>	<b>Personnel Policies</b>				<b>HRSOP 5</b>
<b>Issued:</b>	<b>6/26/2018</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>6/26/2018</b>
<b>Issued to:</b>	<b>Chief Human Resources Officer; General Manager</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To implement best practices in maintaining personnel policies.

**PRODUCT SAFETY:** None.

**INSTRUCTIONS:**

1. The Chief Human Resources Officer will maintain and make available to the Commission upon request the following personnel records:
  - a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
  - b. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
    - i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - ii. Documentation of verification of references;
    - iii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - iv. 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;

- v. Documentation of periodic performance evaluations;
  - vi. A record of any disciplinary action taken; and
  - vii. Notice of completed responsible vendor and eight-hour related duty training.
- c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  - d. Personnel policies and procedures; and
  - e. All background check reports obtained in accordance with 935 CMR 500.030. Please see HRSOP 2 for the procedure regarding background checks.
2. The Chief Human Resources Officer will implement a policy pursuant to 935 CMR 500.105(1) for the immediate dismissal of any marijuana establishment agent who has:
- a. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  - b. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - c. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
3. Company-wide Policies
- a. We are an open door, equal opportunity employer.
  - b. All employment at Pharmacannis Massachusetts is at will.
  - c. There is a zero tolerance policy when it comes to any form of harassment in the workplace.
  - d. All individuals hired by Pharmacann must be authorized to work in the US. We use e-Verify to verify employment eligibility.
  - e. No recording or photography is allowed in the dispensaries.
  - f. All employees are paid bi-weekly on Fridays
  - g. All non-exempt employees are required to use the timekeeping system to record hours worked
  - h. Pharmacannis Massachusetts complies with the salary basis requirements of the Fair Labor Standard Act (FLSA) and does not make improper deductions from the salaries of exempt employees

- i. All employees go through a monthly touch base with their manager process to discuss, plan and review performance
- j. All employees have access to and are encouraged to read the Employee Handbook

**ATTACHMENTS** – None

**REVISION HISTORY**

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>

<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts Inc.</b>	<b>Quality Control and Testing Procedures - Cannabinoid Profiling and Contaminant Screening</b>				<b>LABSOP 1</b>
<b>Issued:</b>	<b>6/27/18</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>6/27/18</b>
<b>Issued to:</b>	<b>All employees</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

**PURPOSE:** To implement best practices pertaining to the quality and testing of cannabis products. To set and define the standard operating procedure to identify and quantify the cannabinoid makeup of dried cannabis, cannabis extract, and cannabis product formulations, and to screen for contaminants including Heavy Metals, Pesticides and Mold/Fungus.

**PRODUCT SAFETY:** To ensure the safe and secure dispensing of adult use marijuana products to qualifying patients and/or their caregivers.

**INSTRUCTIONS:**

1. This procedure applies to all PharmaCannis Massachusetts (PCM) Dispensaries.
2. Pursuant to 935 CMR 500.140(9), the Director of Dispensaries and the General Manager will ensure that no marijuana product, including marijuana, will be sold or otherwise marketed for adult use at the dispensary that is not tested by Independent Testing Laboratories and deemed to comply with the standards required under 935 CMR 500.160.
3. The General Manager will ensure that all marijuana and marijuana products received from cultivators for sale and marketed for adult use is accompanied with documented evidence that the cultivator has complied with the testing requirements of 500.160.
4. Definitions:
  - a. Independent Testing Laboratory: Any lab certified by the Cannabis Control Commission (CCC) for the testing of adult use marijuana and marijuana products

and accredited to the International Organization for Standardization 17025 (ISO/IEC 17025: 2017) by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved by the Commission and independent financially from any RMD in Massachusetts.

- b. Laboratory Agent: Any Laboratory agent registered with the CCC pursuant to 935 CMR 500.050(7) who is determined to be suitable for registration.
  - c. Batch: Cannabis that was grouped together for testing by the licensed cultivator or manufacturer.
5. As PCM will be receiving marijuana and marijuana products from licensed cultivators, the following procedures will be followed:
  6. Upon receipt of wholesale cannabis orders, the General Manager, along with one other designated employee, will receive the order and ensure that all mandatory testing was completed at an Independent Testing Laboratory in accordance with 935 CMR 500.160.
    - a. If there is any question about compliance, lab test results will be requested and obtained.
    - b. Any wholesale agreement with a licensed cultivator or manufacturer who fails to test marijuana or marijuana products to the standard set by the CCC will be terminated immediately.
    - c. Marijuana or marijuana products that have not been lab tested will be refused.
  7. A written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) shall be implemented by the Director of Operations
    - a. This policy shall include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

**ATTACHMENTS**

- None

**REVISION HISTORY**

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>

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<b>STANDARD OPERATING PROCEDURE</b>					
<b>Pharmacannis Massachusetts Inc.</b>	<b>Quality Control and Testing Procedures - Cannabinoid Profiling and Contaminant Screening</b>				<b>LABSOP 1</b>
<b>Issued:</b>	<b>7/3/2018</b>	<b>Replaces:</b>		<b>Last Reviewed:</b>	<b>7/3/2018</b>
<b>Issued to:</b>	<b>All employees</b>	<b>Issued By:</b>	<b>Michelle Stormo</b>	<b>Approved By:</b>	<b>Michelle Stormo</b>

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**PRODUCT SAFETY:** To ensure the safe and secure handling and dispensing of adult use marijuana products to qualifying patients and/or their caregivers.

**INSTRUCTIONS:**

1. This procedure applies to all PharmaCannis Massachusetts (PCM) Dispensaries.
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    - a. This policy shall include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

### **Requirements for the Handling of Marijuana**

8. The dispensary and all dispensary agents will comply with the following requirements for the handling of marijuana as applicable:
  - a. A Marijuana Establishment authorized to process marijuana shall do so in a safe and sanitary manner. A Marijuana Establishment shall process the leaves and flowers of the female marijuana plant only, which shall be:
    - i. Well cured and generally free of seeds and stems;
    - ii. Free of dirt, sand, debris, and other foreign matter;
    - iii. Free of contamination by mold, rot, other fungus, and bacterial diseases;
    - iv. Prepared and handled on food-grade stainless steel tables; and
    - v. Packaged in a secure area.
  - b. All Marijuana Establishments, including those that develop or process non-edible



marijuana products, shall comply with the following sanitary requirements:

- c. Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
- d. Any marijuana establishment agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
  - i. Maintaining adequate personal cleanliness; and
  - ii. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- e. Hand-washing facilities are adequate and convenient and are furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- f. There is sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- g. Litter and waste will be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- h. Floors, walls, and ceilings are constructed in such a manner that they may be adequately kept clean and in good repair;
- i. There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- j. Buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
- k. All contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- l. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- m. A Marijuana Establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- n. Plumbing shall be of adequate size and design, and adequately installed and

maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and wastewater lines;

o. A Marijuana Establishment shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;

p. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and

q. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.

r. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

9. All Marijuana Establishments, including those that develop or process edible marijuana products, shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

## ATTACHMENTS

- None

## REVISION HISTORY

<u>Tracking No.</u>	<u>Revision No.</u>	<u>Author</u>	<u>Change Description</u>



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: DISPENSARY SANITATION & HYGIENE**

**Department: Dispensary**

**SOP: MA-ALL-DSP-002**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

To implement best practices for hygiene and sanitation at dispensary facilities.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the Commonwealth of Massachusetts

## 3. REFERENCES

3.1. 935 CMR 500.130 Additional Operating Requirements for Marijuana Product Manufacturers

3.2. 105 CMR 500.000 Good Manufacturing Practices For Food

3.3. 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements

## 4. RESPONSIBILITY

4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.

4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.

4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.

4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.

4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

5.1. Cross-Contamination – The passing of bacteria, microorganisms, or other harmful substances indirectly from one surface to another through improper or unsanitary equipment and human contact, procedures, or products.

5.2. Adulteration – failure to conform to standards of quality, strength, or purity.

5.3. cGMP – current Good Manufacturing Practice.

5.4. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.

5.5. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.

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## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. The Director of Retail Dispensary Operations or Designee will ensure that the General Manager closely supervises and directs dispensary hygiene and sanitation.
- 8.1.2. The General Manager, or Designee will:
  - 8.1.2.1. Train employees on using proper hand washing, sanitation and hygiene.
  - 8.1.2.2. Follow State or local health department Requirements.
  - 8.1.2.3. Post hand washing signs or posters in a language understood by all staff near all hand washing sinks, in food preparation areas, and restrooms.
  - 8.1.2.4. Provide warm running water, soap, and a means to dry hands. Provide a waste container at each hand washing sink or near the door in restrooms.
  - 8.1.2.5. Keep hand washing sinks accessible anytime employees are present.
  - 8.1.2.6. Supervise dispensary employees to ensure conformance with good sanitation and hygiene practices.
  - 8.1.2.7. Supervisory observation that such employees are not shown to have, or appear to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis products.
  - 8.1.2.8. Taking any other precautions necessary to protect against the contamination of cannabis products, or contact surfaces with microorganisms, filth, or any other extraneous materials, including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin
- 8.1.3. Dispensary Employees – will follow the good sanitation and hygiene practices including:
  - 8.1.3.1. Wearing outer garments in a manner that protects against the contamination of cannabis products, or any contact surface;
  - 8.1.3.2. Maintaining adequate personal cleanliness;
  - 8.1.3.3. Maintaining adequate personal hygiene.
  - 8.1.3.4. Washing hands thoroughly with soap (and sanitizing, if necessary to protect against contamination with microorganisms): before starting work, after using the restroom; and at any other time when the hands may have become soiled

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or contaminated; and at all times before dispensing cannabis products to a patient or caregiver;

- 8.1.3.5. If applicable, gloves will be used to handle cannabis products that have not been pre-packaged;
  - 8.1.3.6. Not storing clothing or other personal belongings in areas where cannabis products, or any contact surfaces are exposed or where contact surfaces are washed; and
  - 8.1.3.7. Taking any other precautions necessary to protect against the contamination of cannabis products, or contact surfaces with microorganisms, filth, or any other extraneous materials, including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin.
  - 8.1.3.8. Not eating food, chewing gum, drinking beverages, or using tobacco products in areas where marijuana products, or any contact surfaces are exposed, or where contact surfaces are washed;
- 8.1.4. All employees will adhere from these requirements and shall conduct themselves according to standard operating procedures, including all levels of management as well as company officers.

### 8.2. Restrictions on Food Handlers

- 8.2.1. A person with the following diseases or conditions may not work as a food handler, except as indicated below:
- 8.2.1.1. **Amebiasis**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antiparasitic treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed.
  - 8.2.1.2. **Enterohemorrhagic E. coli**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antibacterial treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed.
  - 8.2.1.3. **Shigellosis**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antibacterial treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed. See § 27.158 (relating to the special requirements for shigellosis).
  - 8.2.1.4. **Typhoid fever or paratyphoid fever**. Until the etiologic organism has been eradicated as proven by three negative successive stool specimens collected at intervals of at least 24 hours nor earlier than 48 hours after receiving the last dose of a chemotherapeutic drug effective against Salmonella typhi or paratyphi, and no earlier than 1 month after onset.

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- 8.2.1.5. **Hepatitis A, viral hepatitis, or jaundice of unspecified etiology.** Until 1 week following the onset of jaundice, or 2 weeks following symptom onset or IgM antibody positivity if jaundice is not present, as verified by a physician.
- 8.2.1.6. **Persistent diarrhea.** Until resolved or judged to be noninfective by a physician.

### 8.3. Restrooms

- 8.3.1. The General Manager, or Designee, will ensure that restrooms, both men's and women's facilities, are kept clean and in good repair. The restrooms will be checked throughout the day.
- 8.3.2. The General Manager, or Designee, will ensure that the restroom is stocked with toilet paper, soap, and single-use paper towels or other drying devices.
- 8.3.3. A dispensary will provide its employees and visitors with adequate and convenient hand-washing facilities furnished with running water at a temperature suitable for sanitizing hands. The following requirements apply:
  - 8.3.3.1. A dispensary will locate hand-washing facilities where good sanitary practices require employees to wash and sanitize their hands.
    - 8.3.3.1.1. A dispensary will provide its employees and visitors with effective nontoxic sanitizing cleansers and sanitary towel service or suitable hand drying devices.
    - 8.3.3.1.2. A dispensary will provide its employees and visitors with adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair.
    - 8.3.3.1.3. A dispensary will comply with all other applicable State and local building code requirements.

### 8.4. Pest Prevention

- 8.4.1. The dispensary will have adequate protection against pests provided through the use of integrated pest management practices and techniques that identify and manage pest problems, and the regular disposal of trash to prevent infestation.

### 8.5. Site Sanitation

- 8.5.1. The dispensary facility will be maintained in a sanitary condition to limit the potential for contamination or adulteration of the cannabis products stored in or dispensed at the facility.
- 8.5.2. Cleaning compounds, sanitizing agents, solvents and pesticide chemicals will be labeled and stored in a manner that prevents contamination of cannabis products and in a manner that otherwise complies with other applicable laws and regulations.
- 8.5.3. The General Manager, or Designee, will ensure that all trash is properly disposed of at the end-of-the-day (or work shift) or as required to prevent impact to retail operations.



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- 8.5.4. The GM will ensure that the floors, walls and ceiling will be kept in good repair.
- 8.5.5. The General Manager, or Designee, will ensure that the grounds of the dispensary are kept in a condition that protects against the contamination of cannabis products or contact surfaces. The methods for adequate ground maintenance include:
- 8.5.5.1. Properly storing equipment, removing litter and waste, and upkeep of grounds within the immediate vicinity of the premises so that it does not attract pests, harbor pests, or provide pests a place for breeding;
- 8.5.5.2. Adequately operating systems for waste treatment and disposal so that they do not constitute a source of contamination.
- 8.5.6. The General Manager will ensure daily that the interior is maintained in a clean and sanitary condition and maintained in repair.

### 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.





**STANDARD OPERATING PROCEDURE**  
All Massachusetts Locations

**NAME: DISPENSARY GENERAL OPERATIONS**

**Department: Dispensary**

**SOP: MA-ALL-DSP-003**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

To implement the best practices for general dispensary operations and to ensure cannabis orders are dispensed safely, securely and accurately.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the Commonwealth of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.000 - Adult Use of Marijuana
- 3.2. 935 CMR 501.000 - Medical Use of Marijuana
- 3.3. 935 CMR 502.000 - Colocated Adult-Use and Medical-Use Marijuana Operations

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITION

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the

# CONFIDENTIAL

administration of cannabis.

- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary’s limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

The General Manager, or Designee, will closely supervise and direct dispensary operations. These provisions will ultimately be governed by state regulation or as otherwise authorized by the Massachusetts Cannabis Control Commission (“Commission”) and may accordingly be modified immaterially to conform with regulation or other direction from the Commission:

- 8.1. Workplace Safety

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- 8.1.1. Company is committed to the safety and health of its employees, customers, visitors and the general public.
- 8.1.2. Management is firmly committed to a policy enabling all work activities to be carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of dispensary agents, patients/caregivers, contractors, visitors, and the general public.
- 8.1.3. PharmaCann will provide:
  - 8.1.3.1. A safe working environment;
  - 8.1.3.2. PharmaCann facilities will be maintained in good working order;
  - 8.1.3.3. Information, instruction training and supervision that is reasonably necessary to ensure that each dispensary agent is safe from injury and risks to health;
  - 8.1.3.4. A commitment to consult and cooperate with workers in all matters relating to health and safety in the workplace; and
  - 8.1.3.5. A commitment to continually improve workplace safety management
- 8.1.4. Dispensary Agents agree to follow the workplace health and safety requirements.
- 8.2. Business Hours
  - 8.2.1. The General Manager or designee will open the dispensary.
  - 8.2.2. The dispensary will never be left unattended by dispensary employees during the hours of operation.
  - 8.2.3. The dispensary's hours of operation will be posted online and the Commission and Local Law Enforcement will be informed of any operating hour change.
  - 8.2.4. Customer access to the dispensary will occur only during business hours (except as allowed by the Commission for customer events which at no time will include dispensing of cannabis products).
  - 8.2.5. After-hours special events must not involve the sale or dispensing of cannabis products unless authorized by regulation or the Commission
- 8.3. Non-Business Hours
  - 8.3.1. The dispensary will not sell cannabis when the dispensary is closed or in the absence of regular protocol for such sales.
  - 8.3.2. During non-business hours, employees are not permitted in the dispensary, except during a special event sanctioned by senior management and allowed by the Commission and the PharmaCann Compliance Department, or as authorized to perform job duties. Examples of such activity might include patient outreach activities, monitoring HVAC, plumbing or other mechanical work, a cleaning service, or periodic

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inventory activities that are best done outside of regular business hours.

8.3.3. Customers, qualifying patients or designated caregivers will not be allowed to purchase any cannabis products during non-business hours. Under no circumstances will cannabis products be available outside business hours or in the absence of regular protocol for such sales.

8.3.4. The PharmaCann call center will be available for customer inquiries after hours

## 8.4. Dispensary Closure

8.4.1. Customers will be notified using the following methods when there is a delayed opening or the dispensary is closed during its normal hours of operation:

8.4.1.1. Emails will be sent out to customers who have opted to receive email communications from the dispensary;

8.4.1.2. Closure/delay posting notifications will be posted to the dispensary social media page;

8.4.1.3. Any other communication method.

8.4.2. The communication will include but will not be limited to the following:

8.4.2.1. Hours that dispensary will be closed during normal business hours; and

8.4.2.2. The time that the dispensary will reopen. This notification may be provided in a separate communication or posting if the reopening time is not known at the initial communication.

## 8.5. Other General Operational Procedures

8.5.1. The use of cell phones, cameras and any other audio or video recording device by any customer, patient, caregiver, visitor, service professionals or any other individual as a recording device is prohibited inside the dispensary without the prior written consent of the PharmaCann Compliance Department and senior management.

8.5.2. The dispensary will only sell approved cannabis products obtained from licensed processors/growers.

8.5.3. The dispensary will only sell approved cannabis products and related products necessary for the approved forms of administration of cannabis, except as otherwise authorized by the regulations or approved by the Commission.

8.5.4. The dispensary will operate with the good faith intent to maintain an uninterrupted supply of cannabis product for qualifying patients and designated caregivers.

8.5.5. PharmaCann will not permit or allow the consumption, smoking, or vaporization of cannabis products at its dispensary or on the premises without exception.

8.5.6. PharmaCann will not sell any cannabis products to patients or caregivers unless they



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have an active, valid registered card issued by the Commission and a valid government-issued photo ID.

- 8.5.7. PharmaCann will not sell any cannabis products to adult-use purchasers unless they are age 21 or over and have a valid government-issued photo ID.
- 8.5.8. PharmaCann will not operate a drive-thru window.
- 8.5.9. The dispensary will only transport cannabis or cannabis infused products directly to qualifying patients or personal caregivers except as permitted under a permitted delivery plan; or when picking up cannabis products purchased from a licensed dispensary, cultivator or manufacturer under a Metrc Transportation Manifest.
- 8.5.10. PharmaCann will operate a video surveillance and recording system during normal business hours. The video surveillance system, recording system, and the intrusion detection system will be operational outside of business hours in accordance with regulation or other direction from the Commission.
- 8.5.11. PharmaCann will not have 24-hour physical security but will have its electronic security systems in place and operational during the hours that the dispensary is closed for business and not operating.
- 8.5.12. PharmaCann and its employees are prohibited from the following physician related events/activities:
  - 8.5.12.1. Accepting, soliciting, or offering any form of remuneration from or to a physician;
  - 8.5.12.2. Allowing a physician to conduct a personal physical examination of a patient for purposes of diagnosing a debilitating medical condition at the permitted location;
  - 8.5.12.3. Accepting exclusive referral of patients from a physician;
- 8.5.13. Every employee will keep his or her identification card visible at all times when on the dispensary premises. Identification cards will be presented upon the proper request of any law enforcement officer engaged in his or her official duties.
- 8.5.14. A dispensary employee who has done the following shall be dismissed :
  - 8.5.14.1. Diverted Marijuana
  - 8.5.14.2. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - 8.5.14.3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of any Other Jurisdiction
- 8.5.15. PharmaCann will maintain a list of available products and their prices on site at the

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dispensary and on the dispensary website.

8.5.16. A list of all board of directors, members and Executives of the dispensary will be maintained, and members must be made available on request by any individual.

## 8.6. Energy Efficiency and Conservation

8.6.1. PharmaCann facilities evaluate potential energy use reduction opportunities and energy efficiency measures.

8.6.2. Energy efficient appliances and lighting are utilized at PharmaCann dispensary locations.

8.6.3. PharmaCann utilizes LEED-based design principles whenever possible and considers renewable and energy efficient options for new facilities.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
**All Massachusetts Locations**

**NAME: DISPENSARY EMPLOYEE TRAINING**

**Department: Dispensary**

**SOP: MA-ALL-DSP-004**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

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## 1. **PURPOSE**

To implement the best practices at the dispensary for employee training.

## 2. **SCOPE**

This procedure applies to the PharmaCann dispensary located in the Commonwealth of Massachusetts.

## 3. **REFERENCES**

3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments

3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers

3.3. 935 CMR 502.105 - General Operational Requirements

## 4. **RESPONSIBILITY**

4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.

4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.

4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.

4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.

4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. **DEFINITION**

5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.

5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant ("CSC") is a registered dispensary employee who reports to the dispensary's sales and customer service management team.

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in the administration of cannabis.

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- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
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- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
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- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

The General Manager, or Designee will closely supervise and ensure that all employees receive training appropriate to their role.

### 8.1. General

- 8.1.1. Dispensary employees will keep their identification cards visible at all times while working

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on dispensary premises. During this time, the dispensary employee must also provide the PharmaCann Identification Card to any law enforcement officer engaged in his or her official duties upon request.

- 8.1.2. Dispensary employees must comply with all on-site physical security and safety policies.
  - 8.1.3. Dispensary employees will be responsible for compliance with all state laws, regulations and rules pertaining to the dispensing of cannabis.
  - 8.1.4. All employees, prior to the start date, will receive a copy of the "Employee Handbook." It must be returned with a signed attestation that they have read it, understand it and agree to comply with it before they are allowed to begin work.
  - 8.1.5. Records related to employee training will be maintained for four (4) years.
- 8.2. Standard Operational Procedures (SOPs)
- 8.2.1. Dispensary employees must read and sign Attachment 1, which is listed at the end of all SOPS.
- 8.3. Mandatory Training Requirements
- 8.3.1. Dispensary employees must complete 8 hours of annual training.
  - 8.3.2. Dispensary employees must complete all of the mandatory training requirements, including Responsible Vendor Training by a Cannabis Control Commission certified approved company, within 90 days after starting employment at the dispensary.
  - 8.3.3. Training relevant to the responsibilities of principals and employees of cannabis organizations Including:
    - 8.3.3.1. Proper handling of cannabis and cannabis products.
    - 8.3.3.2. Proper recordkeeping
    - 8.3.3.3. How to prevent and detect diversion of cannabis and cannabis products.
  - 8.3.4. Best practice safety procedures, including responding to the following:
    - 8.3.4.1. Medical emergencies.
    - 8.3.4.2. Fires.
    - 8.3.4.3. Chemical spills.
    - 8.3.4.4. Injuries on dispensary premises (i.e. slip/falls).
  - 8.3.5. Discussion concerning Marijuana's effect on the human body that includes:
    - 8.3.5.1. Scientifically based evidence on the physical and mental health effects

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- based on the type of Marijuana Product
- 8.3.5.2. The amount of time to feel impairment;
- 8.3.5.3. Visible signs of impairment; and
- 8.3.5.4. Recognizing the signs of impairment.
- 8.3.6. Compliance with all tracking requirements.
- 8.3.7. The proper use of security measures and controls that have been adopted by the dispensary for the prevention of diversion, theft or loss of cannabis;
- 8.3.8. Training on acceptable forms of identification that includes:
  - 8.3.8.1. How to check identification;
  - 8.3.8.2. Spotting false identification;
  - 8.3.8.3. Patient registration cards formerly issued by the DPH or currently issued by the Commission;
  - 8.3.8.4. Provisions for confiscating fraudulent identifications; and
  - 8.3.8.5. Common mistakes made in verification.
- 8.3.9. Other key state laws and rules affecting Owners, managers, and employees, which shall include:
  - 8.3.9.1. Local and state licensing and enforcement
  - 8.3.9.2. Incident and notification requirements;
  - 8.3.9.3. Administrative and criminal liability;
  - 8.3.9.4. License sanctions;
  - 8.3.9.5. Waste disposal;
  - 8.3.9.6. Health and safety standards;
  - 8.3.9.7. Patrons prohibited from bringing marijuana onto licensed premises; except when returning products.
  - 8.3.9.8. Permitted hours of sale;
  - 8.3.9.9. Conduct of establishment;
  - 8.3.9.10. Permitting inspections by state and local licensing and enforcement authorities;
  - 8.3.9.11. Licensee responsibilities for activities occurring within licensed

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- premises;
- 8.3.9.12. Maintenance of records;
- 8.3.9.13. Prohibited purchases and practices; and
- 8.3.9.14. Confidentiality and privacy requirements of a dispensary.
- 8.3.10. Instruction on the different forms, methods of administration, and strains of cannabis;
- 8.3.11. Instruction on qualifying conditions for cannabis patients, authorized uses of cannabis in the treatment of qualifying conditions;
- 8.3.12. Instruction regarding regulatory inspection preparedness and law enforcement interaction;
- 8.3.13. Employee Handbook
- 8.3.14. Prohibition on illegal drug use or alcohol use while working and prohibition on bringing any illegal drugs or alcohol to work;
- 8.3.15. Smoke-free environment;
- 8.3.16. Harassment-free environment (sexual or otherwise);
- 8.3.17. Workplace violence prevention;
- 8.3.18. Guidelines for appropriate conduct while at work.
- 8.4. Reporting Dispensary Errors.
  - 8.4.1. Dispensary employees must report all dispensing errors to the General Manager or Designee immediately upon discovery or suspicion of a dispensing error and follow the procedures outlined in *MA-ALL-DSP-006 - Dispensing Error Quality Assurance*.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.





**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: DISPENSARY MANAGEMENT**

**Department: Dispensary**

**SOP: MA-ALL-DSP-005**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

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## 1. **PURPOSE**

To implement the best practices for dispensary management training and responsibilities.

## 2. **SCOPE**

This procedure applies to the PharmaCann dispensary located in the Commonwealth of Massachusetts.

## 3. **REFERENCES**

3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments

3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers

3.3. 935 CMR 502.105 - General Operational Requirements

3.4. MA-ALL-DSP-018, *Reporting Incidents and Theft*

## 4. **RESPONSIBILITY**

4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.

4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.

4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.

4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.

4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. **DEFINITION**

5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.

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- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis.
- 5.4. Commission: ("CCC") Massachusetts Cannabis Control Commission.
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- 5.11. Store Manager: The Store Manager ("SM") reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

- 8.1. General

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- 8.1.1. The General Manager will oversee all dispensary operations.
  - 8.1.2. The General Manager, Store Manager, Manager of Sales and Customer Experience, and/or Assistant General Manager must obtain approval from the Director of QA/QC and the District Manager before making any changes to current policy/procedures and/or implementing any new policy/procedures at the dispensary. A request will be submitted to the PharmaCann Compliance Department after all the necessary approvals have been received.
  - 8.1.3. The General Manager, Store Manager and the Assistant General Manager will be responsible for the daily operations of the dispensary.
  - 8.1.4. The General Manager, Store Manager or the Assistant General Manager are required to be present at the dispensary during business hours.
  - 8.1.5. The General Manager, Store Manager and the Assistant General Manager must notify the District Manager and the PharmaCann Compliance Department immediately if he or she is arrested for a qualifying offense.
  - 8.1.6. The General Manager, Store Manager and the Assistant General Manager will be responsible for compliance with all state laws, regulations and rules regulating the dispensing of cannabis.
  - 8.1.7. To the extent not already specified in the SOPs, the General Manager or Designee will develop and implement policies to protect dispensary employees in all operations and provide dispensary employees with adequate safety training to comply with these policies including:
    - 8.1.7.1. Personnel accident reporting and investigation policies;
    - 8.1.7.2. Fire prevention and response plans; and
    - 8.1.7.3. Personal protective equipment policies (as applicable).
- 8.2. Employee Training
- 8.2.1. The General Manager or Designee will oversee and establish an employee training program.
  - 8.2.2. The General Manager or Designee will ensure that employees complete the mandatory training within 90 days of the employee's date of hire, including the Responsible Vendor Training by a certified vendor. See *MA-ALL-DSP-004-Dispensary Employee Training*
- 8.3. Recordkeeping
- 8.3.1. The General Manager must maintain all required dispensary records in dispensary employee files.
  - 8.3.2. The General Manager will ensure that all dispensary employee files include evidence of all training provided to the dispensary employees.

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8.3.3. Employee personnel records will be maintained for a minimum period of 12 months following termination or two (2) years following the closure of the dispensary.

## 8.4. Marijuana Product Deliveries

8.4.1. The General Manager, Store Manager, Assistant General Manager or an adequately trained Operations Lead/Dispensary Inventory Specialist will provide oversight of the delivery and receipt of cannabis products at the dispensary.

8.4.2. The General Manager or Designee will be physically present for all deliveries of cannabis.

8.4.3. Marijuana delivery orders will **only** be sold after the General Manager or Designee inspects and acknowledges that the delivery meets the required packaging and labeling requirements.

8.4.4. The General Manager or Designee will ensure that the order is accurately received in the designated state seed to sale program, Metrc, as well as in our internal seed to sale program.

8.4.5. The General Manager or Designee will ensure that all delivery orders are stored in the Restricted Access area.

8.4.6. Any Marijuana Product that is undeliverable or is refused by the dispensary will be transported back to the originating establishment by the delivering couriers.

8.4.7. Delivered marijuana products will be reweighed (If Applicable), re-inventoried, and accounted for on video within 8 hours of receipt.

## 8.5. Reporting Theft, Loss or Diversion of Cannabis Products

8.5.1. The General Manager will follow the procedures outlined in MA-ALL-DSP-018, *Reporting Incidents and Theft*, when reporting suspected theft, loss or diversion of cannabis products.

## 8.6. Dispensing Error Reporting

8.6.1. The General Manager will:

8.6.1.1. Ensure that all dispensing error reports align with the written Quality Assurance Plan;

8.6.1.2. Provide a copy of the Quality Assurance Program to dispensary employees; and

8.6.1.3. Make the Quality Assurance plan readily available on dispensary premises.

## 8.7. Security, Control and Storage of Cannabis Products

8.7.1. The General Manager, Store Manager and the Assistant Manager will oversee all security SOPs and supervise dispensary employees.

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- 8.7.2. The General Manager will provide personal supervision of the cannabis, cannabis products, order forms, all records relating to the dispensing of cannabis and cannabis products.
- 8.7.3. The General Manager or Designee will log dispensary employees with access to the safe or vault and knowledge of the access code or combination.
- 8.7.4. The General Manager or Designee will keep a log, which will include the name of all dispensary employees with access to the safe or vault and knowledge of the access code or combination.
- 8.7.5. The PharmaCann General Manager, Store Manager and the Assistant General Manager or designee will follow the dispensary operating procedures identified in the SOPs, including the following:
  - 8.7.5.1. Verifying that adult use purchasers are 21 or older and ensuring no sales exceed the legal limit of 1 ounce of marijuana flower or its flower equivalent for concentrates and edibles;
  - 8.7.5.2. Verifying that patients and caregivers have a valid registry identification card and ensuring no sales exceed a 60-day supply that purchases conform patients are;
  - 8.7.5.3. Entry of transaction information into the verification system;
  - 8.7.5.4. Enforcing prohibitions on cannabis use on or near facility property;
  - 8.7.5.5. Removal of non-permitted individuals from the dispensary;
  - 8.7.5.6. Monitoring of the limited access areas.
- 8.8. Disaster Recovery Plan
  - 8.8.1. The General Manager will ensure that written policies and procedures are made available to all dispensary employees to ensure employees know how to prepare for, protect against, and handle any crisis that affects the security or operation of the dispensary in the event of a strike, fire, flood, other natural disasters, or other situations of local, State or national emergency.
- 8.9. Cash Management
  - 8.9.1. The General Manager, Store Manager and the Assistant General Manager will be responsible for the dispensary's cash management process.
  - 8.9.2. The Cash vault and petty cash box will be stored in the vault or another Restricted Access area.
  - 8.9.3. Cash drops are deposited in a safe located in the vault area throughout the day to keep a manageable amount of cash in each register.

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## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: BEST PRACTICE FOR HAND WASHING**

**Department: Dispensary**

**SOP: MA-ALL-DSP-001**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>



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## 1. PURPOSE

The purpose of the procedure is to prevent adulteration and cross-contamination of marijuana products by implementing the best practice for hand washing based on the World Health Organization's (WHO) hand washing technique.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the Commonwealth of Massachusetts

## 3. REFERENCES

- 3.1 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2 105 CMR 500.000 GOOD MANUFACTURING PRACTICES FOR FOOD

## 4. RESPONSIBILITY

- 4.1 It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2 It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3 It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4 The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5 It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

- 5.1 Cross-Contamination – The passing of bacteria, microorganisms, or other harmful substances indirectly from one surface to another through improper or unsanitary equipment and human contact, procedures, or products.
- 5.2 Adulteration – failure to conform to standards of quality, strength, or purity.
- 5.3 Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.4 cGMP – current Good Manufacturing Practice.
- 5.5 General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.6 Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.

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6. **SAFETY** None.

7. **EQUIPMENT/MATERIALS**

- 7.1 Sink.
- 7.2 Warm water.
- 7.3 Soap.
- 7.4 Dry paper towels.
- 7.5 Trash can.
- 7.6 Air blower (If Applicable).

8. **PROCEDURE**

8.1 General

- 8.1.1 State and local health department requirements shall be followed.
- 8.1.2 Use designated hand-washing sinks for hand washing only, e.g., do not wash tools or other equipment in a hand washing sink only.

8.2 Washing Technique (Wet, Lather, Scrub, Rinse, Dry)

The procedure below describes the World Health Organization's (WHO) hand washing technique. WHO recommends 15 -20 seconds of hand washing using the following steps:

- 8.2.1 Wet hands with water;
- 8.2.2 Apply enough soap to cover all hand surfaces. Employees must use liquid soap provided by PharmaCann;
- 8.2.3 Rub hands palm to palm;
- 8.2.4 Rub the back of each hand with the palm of the other interlacing fingers;
- 8.2.5 Rub palm to palm with fingers interlacing fingers;
- 8.2.6 Rub with the back of fingers to opposing palms with fingers interlocked;
- 8.2.7 Rub each thumb clasped in opposite hand using rotational movement;
- 8.2.8 Rub tips of fingers in opposite palm in circular motion;
- 8.2.9 Rub each wrist with the opposite hand;
- 8.2.10 Rinse hands thoroughly with water;
- 8.2.11 Dry hands thoroughly with a clean paper towel or by using an air blower (if available);
- 8.2.12 Turn off water (if applicable) using a paper towel;

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- 8.2.13 When possible, use a paper towel to open the door when exiting the restroom;
- 8.2.14 Discard paper towel in garbage receptacle; and
- 8.2.15 Use sanitizing gel wherever dispensers are available but not in place of hand washing.

## 8.3 When to Wash Hands

- 8.3.1 Before starting work.
- 8.3.2 After eating.
- 8.3.3 After sneezing, coughing, or using a tissue.
- 8.3.4 After using the restroom.
- 8.3.5 After any clean up activities such as sweeping, mopping or wiping counters.
- 8.3.6 After handling trash.
- 8.3.7 Whenever hands are potentially contaminated.

## 8.4 Posting of Signage

- 8.4.1 Post signage, "Employees must wash hands", by any sink designated as such, including restroom sinks.
- 8.4.2 Handwashing signage is to be posted in a language understood by all employees.

## 8.5 Use of Hand Sanitizers

- 8.5.1 As recommended by the CDC, hand sanitizers containing at least 60% alcohol may be used. Employees must use hand sanitizer provided by PharmaCann.
- 8.5.2 Hand sanitizers should be used only after hands have been properly washed and dried.
- 8.5.3 Put enough hand sanitizer on your hands to cover all hand surfaces.
- 8.5.4 At minimum, hand sanitizers are to be used when a hand-washing sink is not readily available and not in place of hand washing. Visitors at minimum should use hand sanitizers when available. *NOTE: Gel sanitizers are not to take the place of hand washing.*

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: DISPENSARY SANITATION & HYGIENE**

**Department: Dispensary**

**SOP: MA-ALL-DSP-002**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

To implement best practices for hygiene and sanitation at dispensary facilities.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the Commonwealth of Massachusetts

## 3. REFERENCES

3.1. 935 CMR 500.130 Additional Operating Requirements for Marijuana Product Manufacturers

3.2. 105 CMR 500.000 Good Manufacturing Practices For Food

3.3. 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements

## 4. RESPONSIBILITY

4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.

4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.

4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.

4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.

4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

5.1. Cross-Contamination – The passing of bacteria, microorganisms, or other harmful substances indirectly from one surface to another through improper or unsanitary equipment and human contact, procedures, or products.

5.2. Adulteration – failure to conform to standards of quality, strength, or purity.

5.3. cGMP – current Good Manufacturing Practice.

5.4. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.

5.5. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.

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## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. The Director of Retail Dispensary Operations or Designee will ensure that the General Manager closely supervises and directs dispensary hygiene and sanitation.
- 8.1.2. The General Manager, or Designee will:
  - 8.1.2.1. Train employees on using proper hand washing, sanitation and hygiene.
  - 8.1.2.2. Follow State or local health department Requirements.
  - 8.1.2.3. Post hand washing signs or posters in a language understood by all staff near all hand washing sinks, in food preparation areas, and restrooms.
  - 8.1.2.4. Provide warm running water, soap, and a means to dry hands. Provide a waste container at each hand washing sink or near the door in restrooms.
  - 8.1.2.5. Keep hand washing sinks accessible anytime employees are present.
  - 8.1.2.6. Supervise dispensary employees to ensure conformance with good sanitation and hygiene practices.
  - 8.1.2.7. Supervisory observation that such employees are not shown to have, or appear to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis products.
  - 8.1.2.8. Taking any other precautions necessary to protect against the contamination of cannabis products, or contact surfaces with microorganisms, filth, or any other extraneous materials, including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin
- 8.1.3. Dispensary Employees – will follow the good sanitation and hygiene practices including:
  - 8.1.3.1. Wearing outer garments in a manner that protects against the contamination of cannabis products, or any contact surface;
  - 8.1.3.2. Maintaining adequate personal cleanliness;
  - 8.1.3.3. Maintaining adequate personal hygiene.
  - 8.1.3.4. Washing hands thoroughly with soap (and sanitizing, if necessary to protect against contamination with microorganisms): before starting work, after using the restroom; and at any other time when the hands may have become soiled

## CONFIDENTIAL

or contaminated; and at all times before dispensing cannabis products to a patient or caregiver;

- 8.1.3.5. If applicable, gloves will be used to handle cannabis products that have not been pre-packaged;
  - 8.1.3.6. Not storing clothing or other personal belongings in areas where cannabis products, or any contact surfaces are exposed or where contact surfaces are washed; and
  - 8.1.3.7. Taking any other precautions necessary to protect against the contamination of cannabis products, or contact surfaces with microorganisms, filth, or any other extraneous materials, including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin.
  - 8.1.3.8. Not eating food, chewing gum, drinking beverages, or using tobacco products in areas where marijuana products, or any contact surfaces are exposed, or where contact surfaces are washed;
- 8.1.4. All employees will adhere from these requirements and shall conduct themselves according to standard operating procedures, including all levels of management as well as company officers.

### 8.2. Restrictions on Food Handlers

- 8.2.1. A person with the following diseases or conditions may not work as a food handler, except as indicated below:
- 8.2.1.1. **Amebiasis**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antiparasitic treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed.
  - 8.2.1.2. **Enterohemorrhagic E. coli**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antibacterial treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed.
  - 8.2.1.3. **Shigellosis**. Until the etiologic organism is eradicated as proven by two consecutive negative stool specimens, obtained at least 24 hours apart, as verified by a physician. If antibacterial treatment has been given, the specimens may not be collected sooner than 48 hours after treatment was completed. See § 27.158 (relating to the special requirements for shigellosis).
  - 8.2.1.4. **Typhoid fever or paratyphoid fever**. Until the etiologic organism has been eradicated as proven by three negative successive stool specimens collected at intervals of at least 24 hours nor earlier than 48 hours after receiving the last dose of a chemotherapeutic drug effective against Salmonella typhi or paratyphi, and no earlier than 1 month after onset.

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- 8.2.1.5. **Hepatitis A, viral hepatitis, or jaundice of unspecified etiology.** Until 1 week following the onset of jaundice, or 2 weeks following symptom onset or IgM antibody positivity if jaundice is not present, as verified by a physician.
- 8.2.1.6. **Persistent diarrhea.** Until resolved or judged to be noninfective by a physician.

### 8.3. Restrooms

- 8.3.1. The General Manager, or Designee, will ensure that restrooms, both men's and women's facilities, are kept clean and in good repair. The restrooms will be checked throughout the day.
- 8.3.2. The General Manager, or Designee, will ensure that the restroom is stocked with toilet paper, soap, and single-use paper towels or other drying devices.
- 8.3.3. A dispensary will provide its employees and visitors with adequate and convenient hand-washing facilities furnished with running water at a temperature suitable for sanitizing hands. The following requirements apply:
  - 8.3.3.1. A dispensary will locate hand-washing facilities where good sanitary practices require employees to wash and sanitize their hands.
    - 8.3.3.1.1. A dispensary will provide its employees and visitors with effective nontoxic sanitizing cleansers and sanitary towel service or suitable hand drying devices.
    - 8.3.3.1.2. A dispensary will provide its employees and visitors with adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair.
    - 8.3.3.1.3. A dispensary will comply with all other applicable State and local building code requirements.

### 8.4. Pest Prevention

- 8.4.1. The dispensary will have adequate protection against pests provided through the use of integrated pest management practices and techniques that identify and manage pest problems, and the regular disposal of trash to prevent infestation.

### 8.5. Site Sanitation

- 8.5.1. The dispensary facility will be maintained in a sanitary condition to limit the potential for contamination or adulteration of the cannabis products stored in or dispensed at the facility.
- 8.5.2. Cleaning compounds, sanitizing agents, solvents and pesticide chemicals will be labeled and stored in a manner that prevents contamination of cannabis products and in a manner that otherwise complies with other applicable laws and regulations.
- 8.5.3. The General Manager, or Designee, will ensure that all trash is properly disposed of at the end-of-the-day (or work shift) or as required to prevent impact to retail operations.



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- 8.5.4. The GM will ensure that the floors, walls and ceiling will be kept in good repair.
- 8.5.5. The General Manager, or Designee, will ensure that the grounds of the dispensary are kept in a condition that protects against the contamination of cannabis products or contact surfaces. The methods for adequate ground maintenance include:
  - 8.5.5.1. Properly storing equipment, removing litter and waste, and upkeep of grounds within the immediate vicinity of the premises so that it does not attract pests, harbor pests, or provide pests a place for breeding;
  - 8.5.5.2. Adequately operating systems for waste treatment and disposal so that they do not constitute a source of contamination.
- 8.5.6. The General Manager will ensure daily that the interior is maintained in a clean and sanitary condition and maintained in repair.

### 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
All Massachusetts Locations

**NAME: DISPENSARY GENERAL OPERATIONS**

**Department: Dispensary**

**SOP: MA-ALL-DSP-003**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

To implement the best practices for general dispensary operations and to ensure cannabis orders are dispensed safely, securely and accurately.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the Commonwealth of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.000 - Adult Use of Marijuana
- 3.2. 935 CMR 501.000 - Medical Use of Marijuana
- 3.3. 935 CMR 502.000 - Colocated Adult-Use and Medical-Use Marijuana Operations

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITION

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient’s behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the

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administration of cannabis.

- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary’s limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

The General Manager, or Designee, will closely supervise and direct dispensary operations. These provisions will ultimately be governed by state regulation or as otherwise authorized by the Massachusetts Cannabis Control Commission (“Commission”) and may accordingly be modified immaterially to conform with regulation or other direction from the Commission:

- 8.1. Workplace Safety

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- 8.1.1. Company is committed to the safety and health of its employees, customers, visitors and the general public.
- 8.1.2. Management is firmly committed to a policy enabling all work activities to be carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of dispensary agents, patients/caregivers, contractors, visitors, and the general public.
- 8.1.3. PharmaCann will provide:
  - 8.1.3.1. A safe working environment;
  - 8.1.3.2. PharmaCann facilities will be maintained in good working order;
  - 8.1.3.3. Information, instruction training and supervision that is reasonably necessary to ensure that each dispensary agent is safe from injury and risks to health;
  - 8.1.3.4. A commitment to consult and cooperate with workers in all matters relating to health and safety in the workplace; and
  - 8.1.3.5. A commitment to continually improve workplace safety management
- 8.1.4. Dispensary Agents agree to follow the workplace health and safety requirements.
- 8.2. Business Hours
  - 8.2.1. The General Manager or designee will open the dispensary.
  - 8.2.2. The dispensary will never be left unattended by dispensary employees during the hours of operation.
  - 8.2.3. The dispensary's hours of operation will be posted online and the Commission and Local Law Enforcement will be informed of any operating hour change.
  - 8.2.4. Customer access to the dispensary will occur only during business hours (except as allowed by the Commission for customer events which at no time will include dispensing of cannabis products).
  - 8.2.5. After-hours special events must not involve the sale or dispensing of cannabis products unless authorized by regulation or the Commission
- 8.3. Non-Business Hours
  - 8.3.1. The dispensary will not sell cannabis when the dispensary is closed or in the absence of regular protocol for such sales.
  - 8.3.2. During non-business hours, employees are not permitted in the dispensary, except during a special event sanctioned by senior management and allowed by the Commission and the PharmaCann Compliance Department, or as authorized to perform job duties. Examples of such activity might include patient outreach activities, monitoring HVAC, plumbing or other mechanical work, a cleaning service, or periodic

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inventory activities that are best done outside of regular business hours.

8.3.3. Customers, qualifying patients or designated caregivers will not be allowed to purchase any cannabis products during non-business hours. Under no circumstances will cannabis products be available outside business hours or in the absence of regular protocol for such sales.

8.3.4. The PharmaCann call center will be available for customer inquiries after hours

## 8.4. Dispensary Closure

8.4.1. Customers will be notified using the following methods when there is a delayed opening or the dispensary is closed during its normal hours of operation:

8.4.1.1. Emails will be sent out to customers who have opted to receive email communications from the dispensary;

8.4.1.2. Closure/delay posting notifications will be posted to the dispensary social media page;

8.4.1.3. Any other communication method.

8.4.2. The communication will include but will not be limited to the following:

8.4.2.1. Hours that dispensary will be closed during normal business hours; and

8.4.2.2. The time that the dispensary will reopen. This notification may be provided in a separate communication or posting if the reopening time is not known at the initial communication.

## 8.5. Other General Operational Procedures

8.5.1. The use of cell phones, cameras and any other audio or video recording device by any customer, patient, caregiver, visitor, service professionals or any other individual as a recording device is prohibited inside the dispensary without the prior written consent of the PharmaCann Compliance Department and senior management.

8.5.2. The dispensary will only sell approved cannabis products obtained from licensed processors/growers.

8.5.3. The dispensary will only sell approved cannabis products and related products necessary for the approved forms of administration of cannabis, except as otherwise authorized by the regulations or approved by the Commission.

8.5.4. The dispensary will operate with the good faith intent to maintain an uninterrupted supply of cannabis product for qualifying patients and designated caregivers.

8.5.5. PharmaCann will not permit or allow the consumption, smoking, or vaporization of cannabis products at its dispensary or on the premises without exception.

8.5.6. PharmaCann will not sell any cannabis products to patients or caregivers unless they

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have an active, valid registered card issued by the Commission and a valid government-issued photo ID.

- 8.5.7. PharmaCann will not sell any cannabis products to adult-use purchasers unless they are age 21 or over and have a valid government-issued photo ID.
- 8.5.8. PharmaCann will not operate a drive-thru window.
- 8.5.9. The dispensary will only transport cannabis or cannabis infused products directly to qualifying patients or personal caregivers except as permitted under a permitted delivery plan; or when picking up cannabis products purchased from a licensed dispensary, cultivator or manufacturer under a Metrc Transportation Manifest.
- 8.5.10. PharmaCann will operate a video surveillance and recording system during normal business hours. The video surveillance system, recording system, and the intrusion detection system will be operational outside of business hours in accordance with regulation or other direction from the Commission.
- 8.5.11. PharmaCann will not have 24-hour physical security but will have its electronic security systems in place and operational during the hours that the dispensary is closed for business and not operating.
- 8.5.12. PharmaCann and its employees are prohibited from the following physician related events/activities:
  - 8.5.12.1. Accepting, soliciting, or offering any form of remuneration from or to a physician;
  - 8.5.12.2. Allowing a physician to conduct a personal physical examination of a patient for purposes of diagnosing a debilitating medical condition at the permitted location;
  - 8.5.12.3. Accepting exclusive referral of patients from a physician;
- 8.5.13. Every employee will keep his or her identification card visible at all times when on the dispensary premises. Identification cards will be presented upon the proper request of any law enforcement officer engaged in his or her official duties.
- 8.5.14. A dispensary employee who has done the following shall be dismissed :
  - 8.5.14.1. Diverted Marijuana
  - 8.5.14.2. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - 8.5.14.3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of any Other Jurisdiction
- 8.5.15. PharmaCann will maintain a list of available products and their prices on site at the

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dispensary and on the dispensary website.

8.5.16. A list of all board of directors, members and Executives of the dispensary will be maintained, and members must be made available on request by any individual.

8.6. Energy Efficiency and Conservation

8.6.1. PharmaCann facilities evaluate potential energy use reduction opportunities and energy efficiency measures.

8.6.2. Energy efficient appliances and lighting are utilized at PharmaCann dispensary locations.

8.6.3. PharmaCann utilizes LEED-based design principles whenever possible and considers renewable and energy efficient options for new facilities.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.





**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**Name: RECEIVING AREA PROTOCOL**

**Department: Dispensary**

**SOP: MA-ALL-DSP-008**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

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## 1. **PURPOSE**

To implement best practices for receiving customers, patients and caregivers at PharmaCann dispensary facilities and ensuring that cannabis orders are dispensed safely, securely and accurately.

## 2. **SCOPE**

This procedure applies to all PharmaCann dispensary locations in the State of Massachusetts.

## 3. **REFERENCES**

- 3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers
- 3.3. 935 CMR 502.105 - General Operational Requirements
- 3.4. *MA-ALL-DSP-009-Visitor Controls.*

## 4. **RESPONSIBILITY**

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. **DEFINITION**

- 5.1. **Adult-Use Purchaser**: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. **Cannabis Sales Consultant**: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. **Caregiver or Designated Caregiver**: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the

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administration of cannabis.

- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary’s limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

The General Manager, or their Designee, will closely supervise and direct the reception of customers, patients, and caregivers at PharmaCann dispensing operations.

### 8.1. General

- 8.1.1. The receiving area may have literature available regarding substance abuse prevention,

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PharmaCann services, information about cannabis and the medical cannabis program, and cannabis use.

- 8.1.2. The receiving area will be staffed at all times during business operations with a receptionist, customer care representative or other safety trained personnel, who will have a line of sight to the entry door and the entirety of the receiving area.
- 8.1.3. Dispensary employees and all on site personnel will follow the PharmaCann privacy policies.
- 8.1.4. Access to the dispensary premises will be limited to customers over 21 with valid, government issued ID and certified patients and caregivers:
  - 8.1.4.1. Medical cannabis patients and caregivers must present a valid patient registration card in addition to a valid government issued ID to dispensary personnel at the time of entry.
  - 8.1.4.2. Every adult use purchaser will be required to present a valid state issued ID confirming that he or she is 21 years of age or older.
- 8.1.5. Visitors who are not customers, patients, or caregivers will be granted access according to the procedures outlined in *MA-ALL-DSP-009- Visitor Controls*.

## 8.2. Receiving Area

- 8.2.1. A designated security staff member or receptionist will monitor the Waiting Area to prevent it from becoming unsafe or congested by allowing only a reasonable number of patients caregivers and adult use consumers to remain in the area at any time and preventing any individual from accessing the Waiting Area if safety, congestion, or overcrowding will be affected.
- 8.2.2. The General Manager may exercise sound judgement in applying this policy, but under no circumstances may the persons present exceed the local building or fire department maximum occupancy.
- 8.2.3. Patient/Caregivers and adult use consumers will be granted access to the Limited Access Dispensing Room when space allows.
- 8.2.4. The waiting/receiving area will not have on display any cannabis products, MIPS, or ancillary products that facilitate cannabis use unless authorized by regulation or allowed by the Cannabis Control Commission, but may have literature available regarding substance abuse prevention, dispensary services, and cannabis use in general.
- 8.2.5. Medical patients will ring the doorbell and present their patient registration card and valid, government issued ID for the camera. Medical patients will then be buzzed into the facility and will proceed directly to the receptionist to show their cards and be directed to the medical only registers.
  - 8.2.6. The dispensary employee will greet the individual and ask to see their patient

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registration card and valid, government issued ID card. Once the cards are presented, the patient/caregiver will be permitted to access the dispensary facility.

- 8.2.7. The CSC will perform a pre-screen for each customer, medical patient, and caregiver by:
  - 8.2.7.1. Verifying that the patients, caregivers, and adult use purchasers possesses a valid government-issued identification card;
  - 8.2.7.2. If applicable, verifying that patients and caregivers possess a state-issued registration identification card or a state-issued temporary card. The registration card or temporary card will be verified with a secondary government issued ID and the CSC will further check validity on the State's electronic database.
  - 8.2.7.3. Checking the patient/caregiver info seed-to-sale software. Each patient/caregiver will be required to present a valid state registration identification card to dispensary personnel prior to being checked in to the seed to sale software. The patient's record will be updated in the seed-to-sale software, if the patient/caregiver has received a renewal card or a permanent registration card.
- 8.2.8. If the patient or caregiver is new to the dispensary, a record will be created for the patient/caregiver. Patient records include patient name, registration number, registration expiration date, caregiver associations, physician contact info, date of birth, contact information, as well as other data.
- 8.2.9. First time patients entering into the facility will be checked in by the CCR following the procedures listed below:
  - 8.2.9.1. Patient/caregiver presents state registration identification card and a valid government-issued ID. **NOTE: Patients/caregivers with expired identifications are not checked into the seed to sale software, removing the possibility of selling to a patient with an expired recommendation;**
  - 8.2.9.2. Patients with expired identifications are automatically blocked during the check in process, removing the possibility of selling to a patient with an expired recommendation. If a medical patient's registration is expired, they may make a purchase as an adult use consumer, paying all applicable taxes at the point of sale.
  - 8.2.9.3. Initial intake materials given to patient/caregiver.
  - 8.2.9.4. CSC collects the intake materials and creates a new patient profile in the seed-to-sale software. Notably, once a patient record is created in seed-to-sale software, any subsequent modifications are logged with details of the changes made, username, and timestamp;

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- 8.2.9.5. Patient is made comfortable in receiving area;
- 8.2.9.6. Patients will be checked for eligibility via the state seed-to-sale and patient verification system, or as otherwise authorized by regulation or directed by the Department.
- 8.2.10. The staff will check the patients/caregivers eligibility via the state approved verification system once the patient/caregiver is permitted to enter the Limited Dispensing Access Area. Once the patient/caregiver enters the limited access area the CSC will have an initial consultation with the patient/caregiver and review any practitioner recommendations accompanying the certification in the states verification system.
- 8.2.11. Each CSC can assist one (1) patient at time unless two patients are related and wish to be taken care of together, or as otherwise authorized by regulation or direction from the Commission.
- 8.2.12. A CSC shall remain with Patient while selecting products.
- 8.2.13. On subsequent visits or consultations, patients/caregivers may be guided as follows:
  - 8.2.13.1. Patient/caregiver present state identification card to the CSC during the check-in process;
  - 8.2.13.2. The CSC will check the seed-to-sale software and state system for validation.
  - 8.2.13.3. Patient/Caregiver may choose to place a pre-order.
- 8.3. Preventing Overflow and Overcrowding in Receiving Area
  - 8.3.1. Patient and caregiver access to the dispensary will occur only during business hours, except as allowed by the Commission for events which at no time will include dispensing of cannabis products.
  - 8.3.2. Cannabis Sales Consultants or safety trained personnel in conjunction with the General Manager, Assistant General Manager or Designee will monitor the receiving area to prevent the receiving area from becoming unsafe, congested or over crowded. Dispensary employees **will not** allow any individual into the receiving area in the event it appears unsafe, congested or overcrowded.
  - 8.3.3. It will be the responsibility of the CSC or the safety trained personnel to monitor the receiving area and ask all individuals to leave the dispensary premises immediately if they are: (i) not engaged in obtaining services or information offered by the dispensary; (ii) not waiting for entry into the receiving area; or (iii) engaged in behavior and/or activities that are prohibited by the Commission or PharmaCann.
  - 8.3.4. The CSC or security staff will:
    - 8.3.4.1. Issue a verbal request to the individual to immediately stop the offending action

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and notify the GM/AGM immediately;

- 8.3.4.2. If the offending action continues, the individual will be asked to immediately leave the premises. Every attempt will be made to reasonably work with the individual to leave;
- 8.3.4.3. If the individual refuses to leave, inform the individual that a direct notification to the public safety answering point (911) for the law enforcement agency having primary jurisdiction over the dispensary will be made.
- 8.3.4.4. The CSC or safety trained personnel will make the above-mentioned call and continue to monitor the receiving area until law enforcement arrives.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
All Massachusetts Locations

**NAME: RESTRICTIONS ON DISPENSARY ACCESS**

**Department: Dispensary**

**SOP: MA-ALL-DSP-010**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>



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## 1. **PURPOSE**

To implement the best practices for restricting access to the limited access and restricted access areas in the dispensary.

## 2. **SCOPE**

This procedure applies to the PharmaCann dispensary located in Massachusetts.

## 3. **REFERENCES**

3.1. 935 CMR 500.110: Security Requirements for Marijuana Establishments

3.2. 935 CMR 501.110: Security Requirements for Marijuana Treatment Centers

3.3. 935 CMR 502.110: Security Requirements

3.4. *MA-ALL-DSP-009-Visitor Controls*

3.5. *MA-ALL-DSP-008-Receiving Area Protocol*

## 4. **RESPONSIBILITY**

4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.

4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.

4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify the General Manager or Designee when deviations from this procedure occur or when revisions to the SOP are appropriate.

4.4. The General Manager, Designee, District Manager or Director of Field Operations in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.

4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. **DEFINITION**

5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.

5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.

5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient’s behalf, to

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possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis

- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

The General Manager or Designee will closely supervise and direct access into the limited access area and restricted access area.

### 8.1. General

- 8.1.1. PharmaCann will establish physical access controls (e.g., keys, locks, and cards) to help

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prevent or detect intrusion or unauthorized access and ensure that employees have the minimum necessary access to perform their daily job functions.

8.1.2. Physical access controls are in place to protect physical computer systems and electronic security systems, the warehousing and vault areas, in the event of natural disasters and environmental hazards.

## 8.2. Access to Keys and Security Codes

8.2.1. The General Manager or Designee(s) will keep all keys and security codes for access to any restricted access area or limited access area stored in a safe and secure manner. The following procedures will be implemented:

8.2.1.1. All keys and security codes when not in use will be either kept in the possession of the General Manager or Designee and stored in a secure location within the dispensary (e.g., vault, safe or similar container in the manager's office); and

8.2.1.2. General Manager or Designee will take reasonable efforts to minimize the number of keys and security codes that are removed from the dispensary.

## 8.3. Receiving Area Control Procedure

8.3.1. The dispensary's process for restricting access to the receiving area is outlined in *MA-ALL-DSP-008-Receiving Area Protocol*.

## 8.4. Limited Access Dispensing Area Control Procedures

8.4.1. The dispensing area is a limited access area, limited to qualifying patients, caregivers, and age-verified adult use customers.

8.4.2. The General Manager or Designee is responsible for the control of the limited access dispensing area including the safe and secure entry and dispensation of cannabis to patients, designated caregivers, or age-verified adult use customers.

8.4.3. The District Manager and the QA Department will ensure that the *standard operating procedures* are developed, implemented, and maintained for the secure handling of all cannabis products in the limited access dispensing area.

8.4.4. Visitors such as contractors and service professionals may be authorized to enter the limited access area pursuant to the procedures in *MA-ALL-DSP-009 Visitor Controls*

## 8.5. Restricted Access Area Control Procedures

8.5.1. The General Manager or Designee will ensure that all cannabis storage areas and areas where security equipment and recordings are stored are securely locked and protected from unauthorized entry. Access to these areas will be granted based on the lowest level of access required to perform duties as assigned by the General Manager or Designee.

8.5.2. Access to the restricted access area will be limited to PharmaCann employees, Commission employees or its authorized representatives, emergency personnel responding to an emergency and any other persons authorized by the PharmaCann

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Compliance Department.

8.5.3. Visitors may only enter non-restricted areas, such as employee break rooms or restrooms, and will not have access to areas containing cannabis without prior approval from the PharmaCann Compliance Department or in the event of an emergency.

8.5.4. The General Manager or Designee will follow the procedures outlined in *MA-ALL-DSP-009 Visitor Controls* to document all persons who access the dispensaries secured areas.

## 8.6. Restroom Policy

8.6.1. The restroom facilities located in the dispensary will only be open to employees, visitors (i.e. service personnel), patients/caregivers and customers.

8.6.2. Dispensary employees will not allow customers or visitors to form lines in the hallway to use the restroom.

8.6.3. For safety concerns, if there are no restrooms immediately available; (i) the patient/caregiver or customer will return to the dispensing area; or (ii) the dispensary employee and the visitor will return to the area where the visitor is authorized to be located.

8.6.4. Visitors will be escorted to the restroom facilities by an employee at all times.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
**All Massachusetts Locations**

**NAME: DISPENSING ERROR QUALITY ASSURANCE PLAN**

**Department: Dispensary**

**SOP: MA-ALL-DSP-006**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

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## 1. PURPOSE

To implement the practices at the dispensary to detect, identify, prevent and report dispensing errors.

## 2. SCOPE

This procedure applies to all PharmaCann dispensary locations in the Commonwealth of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers
- 3.3. 935 CMR 502.105 - General Operational Requirements

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITION

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant ("CSC") is a registered dispensary employee who reports to the dispensary's sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis.
- 5.4. Commission: ("CCC") Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older

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who presents a valid government- issued photo ID for recreational cannabis purchases.

- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. The General Manager or Designee will ensure that all reported dispensing errors align with the Dispensary Quality Assurance Program as described below in Section 8.2.
- 8.1.2. Dispensary employees will be trained on identifying potential errors and will immediately notify the General Manager or Designee upon the discovery of a dispensing error.
- 8.1.3. The District Manager or Designee, will ensure that the General Manager or Designee closely supervises all facility operations to ensure that the Quality Assurance policy is followed in order to detect, identify and prevent dispensing errors.

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8.1.4. Incorrect products sold to adult-use purchasers may be returned at the GM or Designee's discretion if the customer presents a receipt. See *MA-ALL-DSP-021-Product Returns and Abandoned Products*.

8.1.5. The General Manager:

8.1.5.1. Will provide a written copy of the Quality Assurance Program;

8.1.5.2. Will provide a copy of the Quality Assurance Program to all dispensary employees; and

8.1.5.3. Make the Quality Assurance plan readily available on dispensary premises.

## 8.2. Quality Assurance Program

8.2.1. The General Manager or Designee will train all dispensary employees on the prevention, detection and immediate response to all dispensing errors.

8.2.2. Employees must report all dispensing errors to the General Manager or Designee upon confirmation that a dispensing error has occurred or the suspicion that a dispensing error may have occurred.

8.2.3. The General Manager or Designee will immediately notify the District Manager and PC Compliance Department upon the confirmation that a dispensing error has occurred or upon the suspicion that a dispensing error may have occurred.

8.2.4. If the dispensing error occurred in a medical transaction, the General Manager or Designee following the directions provided by the District Manager may contact the patient or the patient's caregiver or as appropriate an authorized family member (pursuant to a signed release).

8.2.5. The General Manager or Designee will identify themselves;

8.2.5.1. The General Manager or Designee will confirm that he or she is speaking with the patient, or the patient's caregiver **before** disclosing any information to the recipient caller.

8.2.5.2. The General Manager or Designee will communicate a suspected or confirmed dispensing error has occurred.

8.2.5.3. The patient or patient's caregiver will be informed of the dispensing error and either offered a return or counseled on the use of the new product.

8.2.5.4. Any person other than the patient or caregiver must sign a HIPAA release form provided by the PharmaCann Compliance Department prior to receiving information about cannabis dispensed to a patient or caregiver

8.2.5.5. The General Manager or Designee will immediately:

8.2.5.5.1. Record the date and time;



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- 8.2.5.5.2. Document the dispensing error;
  - 8.2.5.5.3. Record first and last name of the individual whom the dispensing error communication was made to;
  - 8.2.5.5.4. When applicable, identify the individuals relationship to the patient (i.e. patient's caregiver); and
  - 8.2.5.5.5. Record the dispensing error directions provided to the individual during the call.
- 8.2.6. All correspondence will be immediately documented by dispensary staff in an incident report for review including the date, time and described events. A copy of the incident report shall be maintained for a period of at least 1 year.
- 8.2.7. The following information will be maintained for a minimum period of 1 year:
- 8.2.7.1. Date or dates of the quality assurance review;
  - 8.2.7.2. Information relating to the dispensing error reviewed;
  - 8.2.7.3. Name of dispensary employee(s) performing the review; and
  - 8.2.7.4. Clear documentation of the contact with the qualifying patient/caregiver or the patient, patient's caregiver, or the authorized family member (pursuant to a signed release form).
- 8.2.8. Dispensing incident review:
- 8.2.8.1. The General Manager or Designee will document an investigation and corrective action plan in coordination with the District Manager
    - 8.2.8.1.1. The General Manager will inform dispensary employees of changes to dispensary policy, procedure, systems, or processes made as a result of recommendations generated by the quality assurance program.
- 8.2.9. The following best practices will be adhered to in order to help prevent dispensing errors in the Dispensary:
- 8.2.9.1. All areas where cannabis is being dispensed will have adequate lighting and free from clutter and arranged in order to maximize work-flow;
  - 8.2.9.2. All staff will maintain adequate breaks and rotation in order to minimize fatigue; and
- 8.2.10. Validation procedures including but not limited to the following will be followed:
- 8.2.10.1. Bar code scanning will be used whenever possible as the preferred method of validation;
  - 8.2.10.2. Cannabis product labels will be reviewed on each product for accuracy of patient name to order/product; and

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8.2.10.3. Multiple checks will be in place including during fulfillment and upon final check out of the patient or registered caregiver. Examples include:

8.2.10.3.1. Ask patient/caregiver to verbalize first name and last initial;

8.2.10.3.2. Verbalize the details of the order;

8.2.10.3.3. Confirm the label on item checks with the POS screen;

8.2.10.3.4. Systematic left to right confirmation and bagging; and

8.2.10.3.5. Read back the type of product with Consumer- verbally state the product and whether oral/vape/topical.

8.2.11. The General Manager will coordinate with the District Manager and use the findings of the quality assurance program to develop dispensary systems and workflow processes designed to prevent dispensing errors.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: RECORDKEEPING PRACTICES**

**Department: Dispensary**

**SOP: MA-ALL-DSP-020**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

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## 1. PURPOSE

To implement the best practices for recordkeeping practices for dispensary operations.

## 2. SCOPE

This procedure applies to the PharmaCann dispensary located in the State of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers
- 3.3. 935 CMR 502.105 - General Operational Requirements

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis
- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.

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- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. The General Manager is responsible for maintaining all required dispensary records and employee training records.
- 8.1.2. The following records will be maintained pursuant to 935 CMR 500.105(9):
  - 8.1.2.1. Dispensary standard operating procedures
  - 8.1.2.2. Inventory records

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8.1.2.3. Seed-to-sale tracking records for all cannabis products

8.1.3. Following closure of the dispensary, all records must be kept for at least two years

## 8.2. PharmaCann Records and Point-of-Sale Recording Keeping

8.2.1. PharmaCann's dispensary records will be kept and maintained accessible on the dispensary premises for a period of four years using the seed-to-sale software.

8.2.2. The District Manager or Designee will perform audits on the dispensary recordkeeping practices to ensure compliance with regulatory requirements.

8.2.3. Upon request, PharmaCann will make its records available to the Massachusetts Cannabis Control Commission and other agencies authorized to receive such information.

## 8.3. Product Receipt and Inventory Records:

8.3.1. PharmaCann will keep and maintain records that clearly reflect all inventory records. This includes the following records, which will be kept and maintained on the premises for a period of four (4) years:

8.3.2. Once weekly completed inventory;

8.3.3. Record of all cannabis products disposed of; and

8.3.4. Quarterly and annual inventory audits

## 8.4. PharmaCann Financial Records:

8.4.1. PharmaCann's corporate office will keep and maintain records that clearly reflect all financial transactions and the financial condition of its business.

8.4.2. This includes the following records, which will be accessible at the dispensary premises and maintained for a period no less than four years:

8.4.2.1. Purchase invoices, assets and liabilities, bills of lading, manifests, sales records containing quantity, form, and cost, copies of bills of sale; and any supporting documents (including the items and/or services purchased, from whom the items were purchased, and the date of purchase);

8.4.2.2. Bank statements and canceled checks for all accounts relating to the dispensary;

8.4.2.3. Accounting and tax records related to the dispensary and each producer backer;

8.4.2.4. Records of all financial transactions related to the dispensary, including contracts and/or agreements for services performed or received that relate to the dispensary; and

8.4.2.5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the dispensary.

# CONFIDENTIAL

## 8.5. Employee Records

8.5.1. The GM will keep and maintain employee records that clearly reflect all employee related information of its dispensary business, to include:

8.5.1.1. A personnel record containing the following:

8.5.1.1.1. Massachusetts Marijuana Establishment Agent application materials that were submitted to the Commission;

8.5.1.1.2. Documentation of verification of references;

8.5.1.1.3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;

8.5.1.1.4. 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;

8.5.1.1.5. Documentation of periodic performance evaluations;

8.5.1.1.6. A record of any disciplinary action taken; and

8.5.1.1.7. Notice of completed responsible vendor and eight-hour related duty training.

8.5.1.2. A staffing plan that will demonstrate accessible business hours;

8.5.1.3. Personnel policies and procedures; and

8.5.1.4. All background check reports

## 8.6. Confidential Information

8.6.1. PharmaCann's seed-to-sale tracking software confidentially maintains all records.

8.6.2. A release form must be signed by a patient to authorize any disclosure of patient information to anyone other than the patient or their designated caregiver

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: RECORDKEEPING PRACTICES**

**Department: Dispensary**

**SOP: MA-ALL-DSP-020**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>



# CONFIDENTIAL

## 1. PURPOSE

To implement the best practices for recordkeeping practices for dispensary operations.

## 2. SCOPE

This procedure applies to the PharmaCann dispensary located in the State of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers
- 3.3. 935 CMR 502.105 - General Operational Requirements

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis
- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.

# CONFIDENTIAL

- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.6. Dispensary Inventory Specialist (“DIS”): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary’s inventory management team. Also referred to as “Operations Lead”.
- 5.7. General Manager: The General Manager (“GM”) is responsible for the daily operations of the dispensary.
- 5.8. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience (“MSCE”) reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as “Assistant General Manager”.
- 5.9. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.10. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.11. Store Manager: The Store Manager (“SM”) reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.12. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. The General Manager is responsible for maintaining all required dispensary records and employee training records.
- 8.1.2. The following records will be maintained pursuant to 935 CMR 500.105(9):
  - 8.1.2.1. Dispensary standard operating procedures
  - 8.1.2.2. Inventory records

# CONFIDENTIAL

8.1.2.3. Seed-to-sale tracking records for all cannabis products

8.1.3. Following closure of the dispensary, all records must be kept for at least two years

## 8.2. PharmaCann Records and Point-of-Sale Recording Keeping

8.2.1. PharmaCann's dispensary records will be kept and maintained accessible on the dispensary premises for a period of four years using the seed-to-sale software.

8.2.2. The District Manager or Designee will perform audits on the dispensary recordkeeping practices to ensure compliance with regulatory requirements.

8.2.3. Upon request, PharmaCann will make its records available to the Massachusetts Cannabis Control Commission and other agencies authorized to receive such information.

## 8.3. Product Receipt and Inventory Records:

8.3.1. PharmaCann will keep and maintain records that clearly reflect all inventory records. This includes the following records, which will be kept and maintained on the premises for a period of four (4) years:

8.3.2. Once weekly completed inventory;

8.3.3. Record of all cannabis products disposed of; and

8.3.4. Quarterly and annual inventory audits

## 8.4. PharmaCann Financial Records:

8.4.1. PharmaCann's corporate office will keep and maintain records that clearly reflect all financial transactions and the financial condition of its business.

8.4.2. This includes the following records, which will be accessible at the dispensary premises and maintained for a period no less than four years:

8.4.2.1. Purchase invoices, assets and liabilities, bills of lading, manifests, sales records containing quantity, form, and cost, copies of bills of sale; and any supporting documents (including the items and/or services purchased, from whom the items were purchased, and the date of purchase);

8.4.2.2. Bank statements and canceled checks for all accounts relating to the dispensary;

8.4.2.3. Accounting and tax records related to the dispensary and each producer backer;

8.4.2.4. Records of all financial transactions related to the dispensary, including contracts and/or agreements for services performed or received that relate to the dispensary; and

8.4.2.5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the dispensary.

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## 8.5. Employee Records

8.5.1. The GM will keep and maintain employee records that clearly reflect all employee related information of its dispensary business, to include:

8.5.1.1. A personnel record containing the following:

8.5.1.1.1. Massachusetts Marijuana Establishment Agent application materials that were submitted to the Commission;

8.5.1.1.2. Documentation of verification of references;

8.5.1.1.3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;

8.5.1.1.4. 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;

8.5.1.1.5. Documentation of periodic performance evaluations;

8.5.1.1.6. A record of any disciplinary action taken; and

8.5.1.1.7. Notice of completed responsible vendor and eight-hour related duty training.

8.5.1.2. A staffing plan that will demonstrate accessible business hours;

8.5.1.3. Personnel policies and procedures; and

8.5.1.4. All background check reports

## 8.6. Confidential Information

8.6.1. PharmaCann's seed-to-sale tracking software confidentially maintains all records.

8.6.2. A release form must be signed by a patient to authorize any disclosure of patient information to anyone other than the patient or their designated caregiver

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
**All Massachusetts Locations**

**NAME: RECALL PROCESS AND ADVERSE EVENTS**

**Department: Dispensary**

**SOP: MA-ALL-DSP-022**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

To implement the best practices for handling a mandatory or voluntary product recall and communicating such recall to impacted patients and/or their designated caregivers and adult-use customers when possible.

## 2. SCOPE

This procedure applies to the PharmaCann dispensary located in the Commonwealth of Massachusetts.

## 3. REFERENCES

- 3.1. 935 CMR 500.130 - Additional Operating Requirements for Marijuana Product Manufacturers
- 3.2. 935 CMR 501.130 - Additional Operational Requirements for Handling and Testing Marijuana and for Production of MIPs
- 3.3. 935 CMR 502.130 - Additional Operating Requirements for Product Manufacturing
- 3.4. *MA-ALL-DSP-021-Product Returns and Abandoned Products*

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITION

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Adverse Event: Event where a patient becomes ill or requires medical intervention from a cannabis product.
- 5.3. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.

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- 5.4. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis
- 5.5. Commission: ("CCC") Massachusetts Cannabis Control Commission.
- 5.6. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.7. Dispensary Inventory Specialist ("DIS"): The Dispensary Inventory Specialist is a registered dispensary employee who reports to the dispensary's inventory management team. Also referred to as "Operations Lead".
- 5.8. General Manager: The General Manager ("GM") is responsible for the daily operations of the dispensary.
- 5.9. Manager of Sales and Customer Experience: Manager of Sales and Customer Experience ("MSCE") reports to the Store Manager and is responsible for managing customer sales consultants. Also referred to as "Assistant General Manager".
- 5.10. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.11. Service professional: Service professional means a person who must be present at the dispensary to perform work, including but not limited to those installing or maintaining security devices, delivering cannabis, or providing construction services.
- 5.12. Store Manager: The Store Manager ("SM") reports to the General Manager and is also responsible for the daily operations of the dispensary.
- 5.13. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIAL

None.

## 8. PROCEDURE

- 8.1. The dispensary will establish policies and procedures to conduct mandatory and voluntary recalls of cannabis and/or cannabis products. The procedures established by the dispensary will be adequate to deal with any recalls due to any action initiated at the request of the:

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- 8.1.1. Massachusetts Cannabis Control Commission
- 8.1.2. Any voluntary action by the dispensary to remove defective or potentially defective cannabis from the market or any action undertaken to promote public health or safety by replacing existing cannabis with improved products and packaging.

## 8.2. Mandatory Recall

- 8.2.1. The General Manager or Designee will notify the PharmaCann Quality Assurance Department, the PharmaCann Compliance Department, District Manager upon any receipt of mandatory recall notification.
- 8.2.2. A report will be generated through the seed-to-sale software to compile a list of patients and caregivers who have, or likely have obtained the product from the dispensary. The generated report will indicate which patients and caregivers purchased the recalled batch, lot, or specific product category of cannabis subject to the mandatory recall.
- 8.2.3. The GM or Designee following the direction provided by the Quality Assurance Department, Compliance Department, and District Manager will direct and supervise the contacting of patients and/or their designated caregivers (as appropriate).
- 8.2.4. Adult use purchasers will be notified of product recalls through social media postings. Emails will also be sent to adult use purchasers who opt into the email list.
- 8.2.5. The GM or Designee following the direction provided by the Quality Assurance Department, Compliance Department and District Manager will immediately contact the cultivator or processor to return the product for evaluation.
- 8.2.6. The communication to patients/caregivers will include information relevant to the recall, including direction to return the recalled product to the dispensary for disposal (as required by regulation). The following methods of communication may be used as deemed appropriate:
  - 8.2.6.1. Call the patient/caregiver on the Phone.
  - 8.2.6.2. Document the date, time and name of individual making contact;
  - 8.2.6.3. The email notification sent to patient/caregivers will be saved in the patients/caregivers profile for documentation purposes;
  - 8.2.6.4. In-person during patient/caregiver dispensary visit;
  - 8.2.6.5. Other communication methods as appropriate.
- 8.2.7. Products subject to the mandatory recall will be removed from the dispensary's active product inventory until the Commission provides written notification that the product is safe to sell.

## 8.3. Voluntary Recall

- 8.3.1. The General Manager or Designee will notify the PharmaCann Quality Assurance and Compliance Departments and District Manager upon any notification of confirmed or



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suspected product contamination.

- 8.3.2. A report will be generated through the seed-to-sale software to compile a list of patients and caregivers who have, or likely have obtained the product from the dispensary. The generated report will indicate which patients and caregivers purchased the recalled batch, lot, or specific product category of medical marijuana subject to the mandatory recall.
  - 8.3.3. The GM or Designee following the direction provided by the Quality Assurance Department, Compliance Department, and District Manager will contact the cultivator or processor to return the product for evaluation. The following will also be communicated to the cultivator if available:
    - 8.3.3.1. Information regarding the suspected or confirmed contamination;
    - 8.3.3.2. Provide photos or videos (as appropriate); and
    - 8.3.3.3. Any other information (as deemed appropriate). Maintaining the confidentiality of patients/caregivers is a top priority and the dispensary **will not** disclose the name or address of any patients or caregivers to cultivators or processors.
  - 8.3.4. The GM or Designee following the direction provided by the Quality Assurance Department, Compliance Department, and District Manager will direct and supervise the contacting of patients and/or their designated caregivers (as appropriate).
  - 8.3.5. The communication to patients/caregivers will include information relevant to the recall, including direction to return the recalled product to the dispensary for disposal (as required by regulation). The following methods of communication may be used as deemed appropriate:
    - 8.3.5.1. Phone;
    - 8.3.5.2. The email notification sent to patient/caregivers will be saved in the patients/caregivers profile for documentation purposes;
    - 8.3.5.3. In-person during patient/caregiver dispensary visit; and
    - 8.3.5.4. Other communication methods as appropriate.
  - 8.3.6. Products subject to the voluntary recall will be removed from the dispensary's active product inventory until the cultivator or processor provides written confirmation from an independent lab that the product is not contaminated and the Commission provides written notification, if and when, that the product is safe to sell.
  - 8.3.7. Adult use purchasers will be notified of product recalls through social media postings. Emails will also be sent to adult use purchasers who opt into the email list.
- 8.4. Return of Products Subject to a Mandatory or Voluntary Recall
- 8.4.1. A METRC manifest will be created and the product will be transferred back to the

# CONFIDENTIAL

cultivator in the METRC system

8.4.2. The GM or Designee will weigh the box of recalled products to determine a gross weight

## 8.5. Disposal of Recalled Product

8.5.1. Recalled cannabis products will be wasted or returned to the grower/processor. see *MA-ALL-DSP-023- Cannabis Waste*

## 8.6. Adverse Events Reporting

8.6.1. The General Manager or Designee, in conjunction with the District Manager will complete an Adverse Event Report when the dispensary is notified or becomes aware of any complaint of an adverse event from a patient, caregiver or practitioner who purchased medical marijuana products from the dispensary.

8.6.2. The completed Adverse Event Report will be submitted to the Quality Assurance Department and Compliance Department for review and final approval before the form is submitted to the Cannabis Control Commission.

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**

**All Massachusetts Locations**

**NAME: ADVERTISING**

**Department: Dispensary**

**SOP: MA-ALL-DSP-024**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>

# CONFIDENTIAL

## 1. PURPOSE

The purpose of the procedure is to ensure that all advertising is compliant with local and state law.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the State of Massachusetts

## 3. REFERENCES

- 3.1. 935 CMR 500.105 - General Operational Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.105 - General Operational Requirements for Medical Marijuana Treatment Centers
- 3.3. 935 CMR 502.105 - General Operational Requirements

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITIONS

None.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

- 7.1. Advertising materials

## 8. PROCEDURE

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## 8.1. General

- 8.1.1. The Director of Compliance and Director of Marketing or Designees will review all advertising requests and ensure they are compliant with state and local law.
- 8.1.2. Sponsorship of a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data
- 8.1.3. Applicable advertising and marketing materials will contain the following disclaimer:
  - 8.1.3.1. **Please Consume Responsibly.** Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug. For use only by adults 21 years of age or older or persons holding a patient registration card. Keep out of the reach of children. This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. **KEEP THIS PRODUCT AWAY FROM CHILDREN.** There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact the poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.

## 8.2. The following advertising, marketing, and branding activities are prohibited:

- 8.2.1. Advertising, marketing, and branding in such a manner that is deemed to be is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly or by omission or ambiguity;
- 8.2.2. Advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, 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;
- 8.2.3. Advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- 8.2.4. Advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;

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- 8.2.5. Advertising, marketing, and branding, including statements by a Licensee, that makes any false or statements concerning other Licensees and the conduct and products of such other Licensees that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly or by omission or ambiguity;
- 8.2.6. Advertising, marketing, and branding targeted towards adult-use purchasers through certain identified promotional items such as gifts, giveaways, discounts, points-based reward systems, customer loyalty programs, coupons, or "free" or "donated" Marijuana;
  - 8.2.6.1. This restriction does not apply to advertising, marketing, and branding targeting patients and caregivers in the medical cannabis program.
- 8.2.7. Advertising, marketing, and branding by a Licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a $\frac{1}{2}$ )(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- 8.2.8. Advertising on any billboards, or any other public signage, which fails to comply with all state and local ordinances and requirements;
- 8.2.9. Installation of any illuminated, neon, or external signage beyond the period of 30 minutes before sundown until closing, provided however, that the Commission may further specify minimum signage requirements;
- 8.2.10. The use of vehicles equipped with radio or loudspeakers for the advertising of Marijuana;
- 8.2.11. The use of radio or loudspeaker equipment in any Marijuana Establishment for the purpose of attracting attention to the sale of Marijuana;
- 8.2.12. Advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
- 8.2.13. Operation of any website of a Marijuana Establishment that fails to verify that the entrant is 21 years of age or older;
- 8.2.14. Use of unsolicited pop-up advertisements on the internet or text message;
- 8.2.15. Any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for Marijuana Products which contain obscene or suggestive statements;

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- 8.2.16. Advertising, marketing or branding of Marijuana Products, on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.



**STANDARD OPERATING PROCEDURE**  
All Massachusetts Locations

**NAME: DIVERSITY PLAN**  
**Department: Dispensary**

**SOP: MA-ALL-DSP-034**

<b>Version Number:</b>	<b>001</b>
<b>Effective Date:</b>	<b>06/5/2020</b>



# CONFIDENTIAL

## 1. PURPOSE

To implement best practices for hiring employees that creates a diverse and inclusive organization.

## 2. SCOPE

This procedure applies to all PharmaCann dispensaries located in the State of Massachusetts

## 3. REFERENCES

- 3.1. 935 CMR 500.110: Security Requirements for Marijuana Establishments
- 3.2. 935 CMR 501.110: Security Requirements for Marijuana Treatment Centers
- 3.3. 935 CMR 502.110: Security Requirements

## 4. RESPONSIBILITY

- 4.1. It is the responsibility of the General Manager or Designee to train all employees on this SOP prior to the employee performing their job activities and prior to the effective date of the SOP.
- 4.2. It is also the responsibility of the General Manager or Designee to ensure employees document the training on Attachment 1.
- 4.3. It is the responsibility of all dispensary employees to ensure that the procedures outlined in this procedure are implemented and adhered to. It is also the responsibility of all employees to notify their General Manager or Designee when deviations from this SOP occur or when revisions to the SOP are appropriate.
- 4.4. The General Manager or Designee in conjunction with HR, if necessary, will determine the corrective actions to be taken when deviations from this procedure occur.
- 4.5. It is the responsibility of the General Manager or Designee to maintain all training records.

## 5. DEFINITION

- 5.1. Adult-Use Purchaser: An adult-use purchaser is an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.
- 5.2. Cannabis Sales Consultant: The Cannabis Sales Consultant (“CSC”) is a registered dispensary employee who reports to the dispensary’s sales and customer service management team.
- 5.3. Caregiver or Designated Caregiver: Caregiver or designated caregiver means a person who is designated by a qualifying patient as the person authorized, on the qualifying patient's behalf, to possess, obtain from a certified medical cannabis dispensary, dispense and assist in the administration of cannabis
- 5.4. Commission: (“CCC”) Massachusetts Cannabis Control Commission.
- 5.5. Customer: For the purposes as defined below and throughout this document, customer will mean the following: A registered patient and caregiver or an individual who is at least 21 years of age or older who presents a valid government- issued photo ID for recreational cannabis purchases.

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- 5.6. Qualifying Patient or Patient: Qualifying Patient or Patient means a qualifying patient who has been approved by the Department and has been issued a registry identification card.
- 5.7. Visitor: A person authorized by the Division and the dispensary to enter a dispensary's limited access area, as defined in the regulations, and is not a qualifying patient, designated caregiver, dispensary agent, emergency personnel or service professional.

## 6. SAFETY

None.

## 7. EQUIPMENT/MATERIALS

None.

## 8. PROCEDURE

### 8.1. General

- 8.1.1. A Diversity Plan focusing on hiring practices that create a diverse and inclusive organization is in place at PharmaCann's Massachusetts dispensaries.
- 8.1.2. The Diversity Plan represents an initial approach to establish a comprehensive management plan with goals and measures for inclusion and diversity.
- 8.1.3. The Diversity Plan will be evaluated and modified, when necessary, as our company grows and expands.
- 8.1.4. The Chief Human Resources Officer ("CHRO") is responsible for employment recruitment of women, minorities, veterans, people with disabilities and people of all gender identities and sexual orientation.
- 8.1.5. The Social Equity Manager is responsible for coordinating PharmaCann's diversity plans and community impact plans
- 8.1.6. The CHRO is responsible for contracting with disadvantaged businesses, minority-owned businesses, women-owned businesses, veteran-owned businesses; and disabled-owned businesses and LGBTIQ+ communities.
- 8.1.7. The CHRO will inform minority, womens', disabled individuals, veterans' and LGBTIQ+ organizations seeking applicant referrals and request assistance with job postings and encourage applicant referrals.
- 8.1.8. The CHRO will also work with recruitment firm representatives in Massachusetts to educate them about the marijuana industry and its job needs.

### 8.2. Diversity Plan Goals

- 8.2.1. The Diversity Plan will set achievable percentage goals for the hiring of minorities, women, veterans, people with disabilities and LGBTQ+ individuals with a goal to increase the number of individuals falling into these demographics working in the establishment. The following

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steps are taken to achieve this goal:

- 8.2.1.1. Create gender-neutral job descriptions
  - 8.2.1.2. Recruit from state and local groups
  - 8.2.1.3. Post hiring needs in diverse publications such as a variety of web-based recruitment platforms
  - 8.2.1.4. Participate in local hiring events and job fairs
  - 8.2.1.5. Attend community group meetings, at least two annually, to introduce PharmaCannis and address the existing hiring needs to attract a diverse array of individuals, with an emphasis on those affiliated with the cannabis industry.
- 8.2.2. Work to ensure that all participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.
- 8.2.3. Employee demographics will be assessed annually to determine if the goal of increasing diversity is met or if further steps are necessary to diversity

## 9. REVISION HISTORY

Version No.	Effective Date:	Change Description & Justification
000	05-30-2019	Revised and Reformatted the May 2017 (2nd Ed) PharmaCann SOPs
001	03-31-2020	Re-write to combine medical and adult use SOPs.