



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282298
Original Issued Date: 01/10/2020
Issued Date: 01/10/2020
Expiration Date: 01/16/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: PharmaCannis Massachusetts, Inc.

Phone Number: 312-667-6231 Email Address: compliance@pharmacannis.com

Business Address 1: 939 Boston Turnpike

Business Address 2:

Business City: Shrewsbury

Business State: MA

Business Zip Code: 01545

Mailing Address 1: 939 Boston Turnpike

Mailing Address 2:

Mailing City: Shrewsbury

Mailing State: MA

Mailing Zip Code: 01545

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: 042

Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts

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: 1.06

Percentage Of Control: 1.06

Role: Executive / Officer

Other Role:

First Name: Teddy

Last Name: Scott

Suffix:

Gender: Male

User Defined Gender:

Date generated: 12/03/2020

Page: 1 of 13

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 23.36

Percentage Of Control: 23.36

Role: Board Member

Other Role: Investor

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: 1

Percentage Of Control: 1

Role: Executive / Officer

Other Role: Chief Strategy Officer

First Name: Michael

Last Name: Chodil

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 1

Percentage Of Control: 1

Role: Director

Other Role: Director of Public and Regulatory Affairs

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:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: 1

Percentage Of Control: 1

Role: Other (specify)

Other Role: Chief Financial Officer

First Name: Kimberly

Last Name: Evans

Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 6

Percentage Of Ownership: 1

Percentage Of Control: 1

Role: Employee

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:

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: Verilife

DBA City:

Date generated: 12/03/2020

Page: 2 of 13

Entity Description: Illinois Limited Liability Company

Foreign Subsidiary Narrative:

Entity Phone: 708-919-5641

Entity Email:
compliance@pharmacannis.com

Entity Website: www.pharmacann.com

Entity Address 1: 1010 Lake Street

Entity Address 2: 2nd Floor

Entity City: Oak Park

Entity State: IL

Entity Zip Code: 60301

Entity Mailing Address 1: 1010 Lake Street

Entity Mailing Address 2: 2nd Floor

Entity Mailing City: Oak Park

Entity Mailing State: IL

Entity Mailing Zip Code:
60301

Relationship Description: PharmaCann LLC is the parent company of PharmaCannis Massachusetts, Inc.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Teddy

Last Name: Scott

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Teddy Scott is the Chief Executive Officer, Co-Founder and investor of PharmaCann LLC, and the President 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 of PharmaCann LLC and is also a passive investor. Her ownership is 13.08%.

Close Associates or Member 3

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 of PharmaCann LLC as well as an investor. His ownership is 23.60%.

Close Associates or Member 4

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 in PharmaCann LLC, parent company to PharmaCannis Massachusetts, Inc. His ownership is 17.20%

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: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA:

Entity Description: Medical cannabis cultivation center

Entity Phone:

Entity Email:

Entity Website:

815-561-3051

compliance@pharmacannis.com

Entity Address 1: 16280 E. Twombly Rd

Entity Address 2:

Entity City: Rochelle

Entity State: IL

Entity Zip Code: 61068

Entity Country: USA

Entity Mailing Address 1: 16280 E. Twombly Rd

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State: IL

Entity Mailing Zip Code:

Entity Mailing Country:

Rochelle

61068

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: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA:

Entity Description: Medical cannabis cultivation and processing facility

Entity Phone:

Entity Email:

Entity Website:

815-584-9822

compliance@pharmacannis.com

Entity Address 1: 1200 E. Mazon St

Entity Address 2: Suite A

Entity City: Dwight

Entity State: IL

Entity Zip Code: 60420

Entity Country: USA

Entity Mailing Address 1: 1200 E. Mazon St

Entity Mailing Address 2: Suite A

Entity Mailing City:

Entity Mailing State: IL

Entity Mailing Zip Code:

Entity Mailing Country:

Dwight

60420

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: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: PharmaCannis Health & Wellness

Entity Description: Medical cannabis dispensary

Entity Phone:

Entity Email:

Entity Website:

847-424-0140

compliance@pharmacannis.com

Entity Address 1: 1804 Maple Ave

Entity Address 2:

Entity City: Evanston

Entity State: IL

Entity Zip Code: 60201

Entity Country: USA

Entity Mailing Address 1: 1804 Maple Ave

Entity Mailing Address 2:

Entity Mailing City: Evanston	Entity Mailing State: IL	Entity Mailing Zip Code: 60201	Entity Mailing Country: USA
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Business Interest in Other State 4

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

Owner First Name: Teddy	Owner Last Name: Scott	Owner Suffix:
Entity Legal Name: PharmaCann LLC		Entity DBA: PharmaCannis Health & Wellness
Entity Description: Medical cannabis dispensary		
Entity Phone: 630-264-0890	Entity Email: compliance@pharmacannis.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 5

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

Owner First Name: Teddy	Owner Last Name: Scott	Owner Suffix:
Entity Legal Name: PharmaCann LLC		Entity DBA: PharmaCannis Health & Wellness
Entity Description: Medical cannabis dispensary		
Entity Phone: 815-324-9189	Entity Email: compliance@pharmacannis.com	Entity Website:
Entity Address 1: 4104 North Columbus		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		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 6

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

Owner First Name: Teddy	Owner Last Name: Scott	Owner Suffix:
Entity Legal Name: PharmaCann LLC		Entity DBA: Verilife
Entity Description: Medical cannabis dispensary		
Entity Phone: 847-755-2992	Entity Email: compliance@pharmacannis.com	Entity Website:
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 7

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

Owner First Name: Teddy	Owner Last Name: Scott	Owner Suffix:
Entity Legal Name: PharmaCann LLC		Entity DBA:

Entity Description: Medical cannabis cultivation and manufacturing

Entity Phone: 845-207-0074 **Entity Email:**
compliance@pharmacannis.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
Montgomery

Entity Mailing Zip Code: **Entity Mailing Country:**
12549 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: Teddy **Owner Last Name:** Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: PharmaCannis Health & Wellness

Entity Description: Medical cannabis dispensary

Entity Phone: **Entity Email:**
716-636-0420 compliance@pharmacannis.com

Entity Website:

Entity Address 1: 25 Northpoint Pkwy

Entity Address 2: Suite 30

Entity City: Amherst **Entity State:** NY

Entity Zip Code: 14228 **Entity Country:** USA

Entity Mailing Address 1: 25 Northpoint Pkwy

Entity Mailing Address 2: Suite 30

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

Entity Mailing Zip Code: **Entity Mailing Country:**
14228 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: Teddy **Owner Last Name:** Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: PharmaCannis Health & Wellness

Entity Description: Medical cannabis dispensary

Entity Phone: **Entity Email:**
518-459-2161 compliance@pharmacannis.com

Entity Website:

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
Albany

Entity Mailing Zip Code: **Entity Mailing Country:**
12203 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: Teddy **Owner Last Name:** Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: PharmaCannis Health & Wellness

Entity Description: Medical cannabis dispensary

Entity Phone: **Entity Email:**
718-842-2001 compliance@pharmacannis.com

Entity Website:

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 11

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

Owner First Name: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: PharmaCannis Health & Wellness

Entity Description: Medical cannabis dispensary

Entity Phone:

Entity Email:

Entity Website:

315-457-0425

compliance@pharmacannis.com

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:

Entity Mailing State: NY

Entity Mailing Zip Code:

Entity Mailing Country:

Liverpool

13088

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: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: PharmaCann LLC

Entity DBA: Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone:

Entity Email:

Entity Website:

708-919-5641

compliance@pharmacannis.com

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:

Entity Mailing State: MD

Entity Mailing Zip Code:

Entity Mailing Country:

Rockville

20852

USA

Business Interest in Other State 13

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

Owner First Name: Teddy Owner Last Name: Scott

Owner Suffix:

Entity Legal Name: Midwest Compassion Center Inc.

Entity DBA: Midwest Compassion Center

Entity Description: Medical Cannabis dispensary

Entity Phone:

Entity Email:

Entity Website:

630-359-3213

compliance@pharmacannis.om

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: #4

Entity Mailing City:

Entity Mailing State: IL

Entity Mailing Zip Code:

Entity Mailing Country:

Romeoville

60446

USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Teddy

Last Name: Scott

Suffix:

Marijuana Establishment Name: PharmaCann LLC

Business Type: Marijuana Cultivator

Marijuana Establishment City: Dwight

Marijuana Establishment State: IL

Individual 2

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCann LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Rochelle	Marijuana Establishment State: IL	

Individual 3

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: Evanston	Marijuana Establishment State: IL	

Individual 4

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: North Aurora	Marijuana Establishment State: IL	

Individual 5

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: Ottawa	Marijuana Establishment State: IL	

Individual 6

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: Verilife	Business Type: Marijuana Retailer	
Marijuana Establishment City: Arlington Heights	Marijuana Establishment State: IL	

Individual 7

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: Midwest Compassion Center	Business Type: Marijuana Retailer	
Marijuana Establishment City: Romeoville	Marijuana Establishment State: IL	

Individual 8

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCann LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Montgomery	Marijuana Establishment State: NY	

Individual 9

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: Amherst	Marijuana Establishment State: NY	

Individual 10

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: Albany	Marijuana Establishment State: NY	

Individual 11

First Name: Teddy	Last Name: Scott	Suffix:
Marijuana Establishment Name: PharmaCannis Health & Wellness	Business Type: Marijuana Retailer	
Marijuana Establishment City: Bronx	Marijuana Establishment State: NY	

Individual 12

First Name: Teddy Last Name: Scott Suffix:

Marijuana Establishment Name: PharmaCannis Health & Wellness Business Type: Marijuana Retailer

Marijuana Establishment City: Liverpool Marijuana Establishment State: NY

Individual 13

First Name: Teddy Last Name: Scott Suffix:

Marijuana Establishment Name: Verilife Business Type: Marijuana Retailer

Marijuana Establishment City: Rockville Marijuana Establishment State: MD

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 939 Boston Turnpike

Establishment Address 2:

Establishment City: Shrewsbury Establishment Zip Code: 01545

Approximate square footage of the establishment: 10500 How many abutters does this property have?:
41

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	CCC HCA Certification - Pharmacann (1).pdf	pdf	5c86b4b7c4b7a71b66d14b98	03/11/2019
Community Outreach Meeting Documentation	Community Outreach meeting Attestation and supporting docs.pdf	pdf	5c87f9ae8d16491b5c0fa595	03/12/2019
Community Outreach Meeting Documentation	Community Outreach Hearing Notification.pdf	pdf	5d03d27e624ce5135e926b72	06/14/2019
Plan to Remain Compliant with Local Zoning	Revised Shrewsbury - Local Zoning Compliance Plan.pdf	pdf	5d975b446eb01d1b28faffd4	10/04/2019

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact (PC 5.29.19).pdf	pdf	5d03f19764ca8317f4fcbd5b	06/14/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer Other Role: Chief Strategy Officer

First Name: Michael Last Name: Chodil Suffix:

RMD Association: RMD Manager

Background Question: yes

Individual Background Information 2

Role: Executive / Officer

Other Role: Controller

First Name: Kimberly

Last Name: Evans **Suffix:**

RMD Association: RMD Manager

Background Question: yes

Individual Background Information 3

Role: Board Member

Other Role: Owner

First Name: Stephen

Last Name: Schuler **Suffix:**

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 4

Role: Owner / Partner

Other Role:

First Name: Norah

Last Name: Scott **Suffix:**

RMD Association: RMD Owner

Background Question: no

Individual Background Information 5

Role: Executive / Officer

Other Role: Chief Executive Officer

First Name: Teddy

Last Name: Scott **Suffix:**

RMD Association: RMD Manager

Background Question: yes

Individual Background Information 6

Role: Executive / Officer

Other Role: Executive Director

First Name: Michelle

Last Name: Stormo **Suffix:**

RMD Association: RMD Manager

Background Question: no

Individual Background Information 7

Role: Owner / Partner

Other Role:

First Name: Daniel

Last Name: Tierney **Suffix:**

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 8

Role: Executive / Officer

Other Role: Director of Public and Regulatory Affairs

First Name: Jeremy

Last Name: Unruh **Suffix:**

RMD Association: RMD Manager

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company

Other Role:

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

Entity Description: IL LLC - parent company to PharmaCannis Massachusetts, Inc.

Phone: 708-919-5641 **Email:** compliance@pharmacannis.com

Primary Business Address 1: 190 South LaSalle **Primary Business Address 2:** Suite 2950

Primary Business City: Chicago **Primary Business State:** IL **Principal Business Zip Code:** 60603

Additional Information:

Entity Background Check Information 2

Role: Other (specify) **Other Role:** Wholly-Owned Subsidiary of Parent Company, PharmaCann LLC

Entity Legal Name: PharmaCannis Massachusetts, Inc. **Entity DBA:** Verilife

Entity Description: Wholly-Owned Subsidiary of Parent Company, PharmaCann LLC

Phone: 708-919-5641 **Email:** compliance@pharmacannis.com

Primary Business Address 1: 112 Main Street **Primary Business Address 2:**

Primary Business City: Wareham **Primary Business State:** MA **Principal Business Zip Code:** 02571

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Executed BHA Conversion Packet (1).pdf	pdf	5c82ed202724e81b5255d243	03/08/2019
Articles of Organization	3 Articles of Organization- Brighton Health Advocates, Inc..pdf	pdf	5c82ed52eadf341230f69749	03/08/2019
Bylaws	5 Pharmacannis Massachusetts Signed Bylaws.pdf	pdf	5c82ed545fd63c1b24eb6fb6	03/08/2019
Department of Revenue - Certificate of Good standing	MA Good Standing.pdf	pdf	5c87d2d43d84de123a61369b	03/12/2019
Secretary of Commonwealth - Certificate of Good Standing	SOS Certificate of Good Standing 3.12.2019.pdf	pdf	5c89670e1e71bd126232dc93	03/13/2019
Department of Revenue - Certificate of Good standing	Company Name for DOR Certification of Good Standing.pdf	pdf	5d0d3e16acc50017edd640d4	06/21/2019

No documents uploaded

Massachusetts Business Identification Number: 001317349

Doing-Business-As Name: Verilife

DBA Registration City: Wareham

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability	7 MA Adult Use Insurability Letter.pdf	pdf	5c87d3379ff0081b4821c82f	03/12/2019

Insurance				
Business Plan	Business Plan - Shrewsbury.pdf	pdf	5c950966b411c1126cf066f2	03/22/2019
Proposed Timeline	Revised SB - Proposed Timeline for Achieving Operations.pdf	pdf	5d976aa3a489aa1afc401144	10/04/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	SB - Plan for Obtaining Marijuana and Marijuana Products.pdf	pdf	5c9540651e71bd126232ef9e	03/22/2019
Separating recreational from medical operations, if applicable	SB - Plan for Separating Medical and Recreational Sales.pdf	pdf	5c95406fb411c1126cf067ab	03/22/2019
Storage of marijuana	DSPSOP 8 - Product Storage.pdf	pdf	5c9a6b19635d511b34753e11	03/26/2019
Storage of marijuana	SECSOP 15 - Product Storage and Vault Controls (1).pdf	pdf	5c9a6b1ad7a931124ee072fc	03/26/2019
Transportation of marijuana	Transportation Plan .pdf	pdf	5d0d3a331dae681319cebe3d	06/21/2019
Prevention of diversion	Prevention of Diversion Plan .pdf	pdf	5d0d3a6433099617d7946b11	06/21/2019
Dispensing procedures	Dispensing Procedures.pdf	pdf	5d0d3a8d622b7c1357f72fad	06/21/2019
Personnel policies including background checks	Personnel Policies.pdf	pdf	5d0d3a9a64ca8317f4fccc8b	06/21/2019
Qualifications and training	Qualification and Intended Training for Agents .pdf	pdf	5d0d3acd722cea17c12626d8	06/21/2019
Inventory procedures	Inventory Procedures.pdf	pdf	5d0d4ff8acc50017edd64101	06/21/2019
Quality control and testing	Quality Control and Testing Procedures.pdf	pdf	5d0d5012c70e2b132b316d87	06/21/2019
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	5d0d503cfe6a8617e2090409	06/21/2019
Maintaining of financial records	Maintaining of Financial Records .pdf	pdf	5d0d5047acc50017edd64105	06/21/2019
Security plan	Security Plan .pdf	pdf	5d0d53e3c70e2b132b316d8f	06/21/2019
Diversity plan	Revised Shrewsbury Diversity Plan 12.9.19.pdf	pdf	5deead68d5b0805341c65d52	12/09/2019

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close

associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

I Agree

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

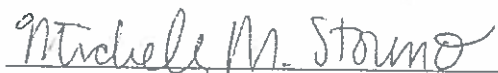
Monday From: 8:00 AM	Monday To: 10:00 PM
Tuesday From: 8:00 AM	Tuesday To: 10:00 PM
Wednesday From: 8:00 AM	Wednesday To: 10:00 PM
Thursday From: 8:00 AM	Thursday To: 10:00 PM
Friday From: 8:00 AM	Friday To: 10:00 PM
Saturday From: 8:00 AM	Saturday To: 10:00 PM
Sunday From: 8:00 AM	Sunday To: 10:00 PM

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, certify as an authorized representative of Pharmacannis Massachusetts Inc. that the applicant has executed a host community agreement with the Town of Shrewsbury pursuant to G.L.c. 94G § 3(d) on December 12, 2018.



Signature of Authorized Representative of Applicant

Host Community

I, Kevin Mizikar, certify that I am the contracting authority or have been duly authorized by the contracting authority for the Town of Shrewsbury to certify that the applicant and the Town of Shrewsbury has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on December 12, 2018.



Signature of Contracting Authority or
Authorized Representative of Host Community

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, attest as an authorized representative of Pharmacannis Massachusetts Inc. 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 Monday, January 7, 2019.
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 12/20/18 and 12/27/18, which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A.
3. A copy of the meeting notice was also filed on 12/27/19 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.
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on 12/29/18, 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.

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.



COMMUNITY OUTREACH HEARING Proposed Marijuana Establishment

Date: 1/7/19

Time: 7:00-8:00 pm

Location : Shrewsbury Public Library, 609 Main St.

Shrewsbury, MA 01545

Presented by: PharmaCannis Massachusetts Inc (dba. Verilife)

Proposed address for retail establishment: 939 Boston Turnpike

Shrewsbury, Ma 01545

There will be an opportunity for the public to ask questions



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Time: 7:00-8:00 pm

**Location : Shrewsbury Public Library, 609 Main St.
Shrewsbury, MA 01545**

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2019 DEC 27 PM 3:09
COMMUNICATIONS
2019 DEC 27 PM 3:09

COMMUNITY OUTREACH HEARING

Proposed Marijuana Establishment

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Time: 7:00-8:00 pm

Location : Shrewsbury Public Library, 609 Main St.

Shrewsbury, MA 01545

Presented by: PharmaCannis Massachusetts Inc (dba. Verilife)

Proposed address for retail establishment: 939 Boston Turnpike

Shrewsbury, Ma 01545

There will be an opportunity for the public to ask questions

Plan to Remain Compliant with Local Zoning

To ensure compliance with local zoning, the Company has been meeting with Town of Shrewsbury officials since March 2018. The Company has also presented to the Town's department heads, the Board of Directors, and the Zoning Board of Appeals. Our location at 939 Boston Turnpike is specifically locally zoned for dispensaries (adult use and medical). Section VII(T) of Shrewsbury's Zoning By-Laws (pp. 151-53) governs the local licensing requirements for the adult use of marijuana. The Company has already obtained all required variances before Shrewsbury's Zoning Board of Appeals, and the Company received the required local permit before Shrewsbury's Planning Board on October 3, 2019. The Company will continue its consistent outreach to and communication with town officials, in large part to ensure we remain compliant with all local zoning and licensing requirements, including those established in Section VII(T) of Shrewsbury's Zoning By-Laws.

Plan for Positive Impact

INTENT

Cannabis prohibition has disproportionately impacted certain communities in Massachusetts. As the Commonwealth begins to embrace the adult-use cannabis industry in earnest, Pharmacannis Massachusetts, Inc (“Pharmacannis” or “Company”) recognizes that it has a responsibility to contribute to the communities in which it does business and the surrounding areas in need. PharmaCannis will focus its time and resources on Wareham, which has been identified by the Commission as an area of disproportionate impact. PharmaCannis is fully committed to ensuring that it is making positive and lasting contributions to areas of disproportionate impact.

PURPOSE

The purpose of this document is to summarize PharmaCannis’ plan to ensure our business creates positive and lasting impacts on the communities in which it will be involved.

PharmaCannis is committed to fostering positive relationships within the community and endeavoring to identify ways in which to give back. PharmaCannis seeks to utilize our resources, including time, talent and monies, to provide assistance to those who may be underserved and/or in need. We plan to achieve these goals through charitable giving, volunteer time and community engagement.

INITIATIVES AND METRICS

PharmaCannis aims to implement the following initiatives to assist those communities that have been disproportionately impacted.

Proposed Initiative: PharmaCannis will commit to identifying charitable organizations within Wareham to assist those people and causes that require and will benefit from the resources the most. PharmaCannis will ensure that any charitable contributions that are made have been discussed with the identified organization and a written agreement is entered into acknowledging the acceptance of money donated by a cannabis company. This documentation will be provided to the Commission upon execution by both parties. In the event that a charitable organization within Wareham cannot be identified, PharmaCannis will make a contribution to the Commission’s Social Equity Loan Trust Fund.

Goal: PharmaCannis will endeavor to provide financial assistance to organizations and groups that have been identified in disproportionately impacted areas as fitting in with PharmaCannis’ goals and need the most help.

Metrics: PharmaCannis will maintain a record of the organizations and charities to which it has donated funds. PharmaCannis will keep records of feedback that we receive relative to the impact of our contributions. This will in turn help us make decisions about

PharmaCanniss Massachusetts, Inc
Application of Intent

adjustments that need to be made in the future, either amounts given or whether alternative charities should be considered.

Proposed Initiative: PharmaCanniss believes that the recreational cannabis industry in Massachusetts will drive economic growth for the state by increasing overall job creation and taxable revenue. PharmaCanniss will work diligently to attract and hire local qualified talent from areas of disproportionate impact in Wareham or individuals who have been disproportionately harmed by marijuana prohibition. These individuals will be given priority in the hiring process for open positions of employment. Management of PharmaCanniss will attend community job fairs, at least one annually, in Wareham with the intent of garnering employment interest and applications from residents in areas of disproportionate impact. If permissible under 935 CMR 500.105(4)(b), management will post employment opportunity advertisements in Wareham newspapers, and bulletin boards in local stores, places of worship, and City municipal buildings where permitted to attract a variety of local job applicant interest. PharmaCanniss will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Goal: PharmaCanniss hopes to attract individuals from areas of disproportionate in order to ensure inclusion in the legal cannabis industry.

Metrics: PharmaCanniss will track the number of community job fairs attended in Wareham and the number of employees hired that are from areas of disproportionate impact in Wareham or are considered populations disproportionately impact by marijuana prohibition. These records will allow PharmaCann to demonstrate progress toward its goals to the Commission upon the annual renewal of its license.

Proposed Initiative: PharmaCanniss will commit to provide employees with paid time to participate in a neighborhood clean-up initiative that serves identified areas of disproportionate impact. PharmaCanniss will focus their clean-ups in Wareham, and when needed in the area immediately around their marijuana establishment.

Goal: PharmaCanniss is committed to serving communities that have been disproportionately impacted by serving individuals and organization through the contribution of employee volunteer time courtesy of the company.

Metrics: PharmaCanniss will maintain records of each employee who participates in the neighborhood clean-up program and the number of hours contributed by each employee. PharmaCanniss will host two clean-up days annually, one in the Spring and one in the Fall. PharmaCanniss will then solicit feedback from each employee to learn about their experiences and determine whether adjustments should be made in the future with regards to this program.

CONCLUSION

PharmaCanniss will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set

PharmaCannis Massachusetts, Inc
Application of Intent

out in this Plan for Positive Impact. Any actions taken, or programs instituted by PharmaCannis will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

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.

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

(number, street, city or town, state, zip code)

, which is

- ☒ 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 22nd day of February, 2018

COMMONWEALTH OF MASSACHUSETTS

SECRETARY OF THE
COMMONWEALTH

2018 MAR 12 AM 11:44

CORPORATION'S DIVISION

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

**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 a.m./p.m.
time

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


WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

JB
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. If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

1307168



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, stylized 'G' at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BYLAWS
PHARMACANNIS MASSACHUSETTS, INC.

Article I: Offices

Section 1. Principal Office. The principal office of the Corporation shall be 1010 Lake Street, 2nd 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



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

mass.gov/dor

Letter ID: L0764123520
Notice Date: March 11, 2019
Case ID: 0-000-235-751



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



BRIGHTON HEALTH ADVOCATES
112 MAIN ST
WAREHAM MA 02571-2171

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 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, 2019

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 blue ink, reading "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 19030231270

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

Processed by:

Pharmacannis Massachusetts, Inc.
Management and Operations Profile
DOR Certificate of Good Standing

Brighton Health Advocates, Inc (“BHA”), originally established as a not-for-profit entity, converted to Pharmacannis Massachusetts, Inc. (“PCM”), a for-profit entity, on February 27, 2018. At this time, a management services agreement between BHA and PharmaCann Mass LLC was terminated and BHA became a wholly-owned subsidiary of PharmaCann Mass LLC. The letter of compliance provided by the MA Department of Revenue still reflects BHA as the original applicant entity. Please refer to the entity conversion packet provided with the application. PCM has made repeated attempts to change the entity name with the Department of Revenue but, to date, certificates of compliance have only been issued under the BHA name.



April 11, 2018

Mr. Teddy Scott
PharmaCann LLC
1010 Lake Street, 2nd 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

Executive Summary

PharmaCann Mass, LLC, a Massachusetts limited liability company, is a wholly-owned subsidiary of PharmaCann LLC (“PharmaCann” or the “Company”). PharmaCann was founded in 2014 by a group of mission-driven individuals who saw a need to bring a science-based, professional approach to a marijuana industry was quickly becoming recognized as a viable alternative for patients suffering from debilitating conditions.

Since its founding, PharmaCann has grown to over 250 employees operating 12 marijuana facilities (2 grow/process facilities; 10 dispensaries) and serving thousands of patients and customers in highly regulated states. PharmaCann has grown organically around a core of objective, data-driven professionals with a range of expertise including chemical engineering, pharmaceutical research, healthcare, horticulture, retail operations management, logistics, information technology, accounting, finance, regulatory compliance, and law. PharmaCann does not rely on consultants or non-employee advisors. PharmaCann is led by a management team experienced with a demonstrated capability to execute, and in a relatively short period of time, PharmaCann has grown to be one of the country’s leading marijuana organizations.

Products: PharmaCann’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: PharmaCann’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

PharmaCann Mass, LLC is a Massachusetts limited liability company and a wholly-owned subsidiary of PharmaCann, which as the parent company provides the highest level of compliance, transparency and accountability to regulators, accountants, and financial institutions. PharmaCann is managed by a Board of Managers, including the Company’s CEO/Founder, Teddy Scott, who is the senior corporate officer in charge of managing the Company. Reporting to the CEO is a leadership team consisting of the Chief Operating Officer/Chief Financial Officer, the Chief Human Resources Officer, the Chief Strategy Officer and the General Counsel. The leadership team meets on a bi-weekly basis to ensure that PharmaCann’s multi-state 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 Manager of Quality, the Director of Cultivation, the Lead Pharmacist, the Director of Research and Development, the Director of IT Infrastructure, in addition to geographic-specific directors.

PharmaCann's Executive Director of Massachusetts, Shelley Stormo, oversees the Company's current operations in Massachusetts. The Company is currently operating a co-located medical and adult use dispensary in Wareham, MA, the fourth adult use dispensary to open in the Commonwealth. Additionally, the Company is operating (and constructing) a grow/process facility in Holliston. PharmaCann's operations in Massachusetts have maintained full compliance with state and local regulatory directives.

Financial Plan

PharmaCann believes ample access to capital and prudent financial management are necessary to provide an uninterrupted supply of marijuana in safe and compliant facilities. While PharmaCann fully intends to build and maintain financially and operationally sound recreational dispensaries in Massachusetts that will thrive on their own, PharmaCann is also able to rely on its substantial cash flow generating operations, its significant cash balance (\$20.2 million as of 12/31/17) and the ample sources of additional capital it maintains.

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

Fundraising History: The success of PharmaCann 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. PharmaCann 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 PharmaCann in order to fund any dispensary-related expenses in Massachusetts.

	\$ MM's
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
Total capital / cash raised as of 12/13/2017	\$130.0

Pharmacannis Massachusetts, Inc. (PCM)

Plan for Separating Medical from Recreational Sales

PCM will co-locate its Medical and Adult Use Retail dispensary site at 939 Boston Turnpike in Shrewsbury. Upon entry into the dispensary by an individual, a dispensary agent will inspect the individual's proof of identification and determine that the individual is 21 years of age or older. A patient registration card is not sufficient proof of age. If the individual is between 18 and 21 years of age, he or she will not be admitted unless they produce an active patient registration card issued by the Department of Public Health or the Cannabis Control Commission. If the individual is younger than 18 years old, he or she will not be admitted without an active patient registration card and a personal caregiver with an active patient registration card. In addition to the patient registration card, registered Qualifying Patients 18 years of age and older and personal caregivers must also produce proof of identification.

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 materials 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 will have 1-2 registers for medical patients and the other side has 5-6 registers for adult use. Upon entering the dispensing area, medical patients will be served at the first set of registers, closest to the bathrooms and Consult Room. Adult Use consumers will be served at the other set of registers, 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 payments.

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.

Personnel Policies

General

In accordance with 935 CMR 500.101(1)(c) and 935 CMR 500.101(2)(e), Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") has developed personnel policies to serve as the foundation for the Human Resources team and managers to oversee all employee related matters. Pharmacannis values its employees and believes that each one contributes directly to the Company's success. Pharmacannis promotes a culture where management and employees value the integrity of the company and the industry while also being wholly compliant with state cannabis regulations and applicable federal, state and local laws.

Pharmacannis is an open door, equal opportunity employer and will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable laws. All individuals hired by Pharmacannis must be authorized to work in the US, which is verified by e-Verify. All employment at Pharmacannis is at will and employees are paid bi-weekly on Fridays. All non-exempt employees are required to use a timekeeping system to record hours worked. Pharmacannis 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. Company strives to create and maintain a work environment in which people are treated with dignity, decency and respect. Company will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Pharmacannis will seek to prevent, correct and discipline behavior that violates this policy. All employees go through a monthly touch base with their manager to discuss, plan and review performance. All employees have access to and are encouraged to read the Employee Handbook.

Pharmacannis is committed to fulfilling its obligations under the Americans With Disabilities Act and all other applicable state and federal statutes governing the workplace and its employees. It is the policy of Company to hire, train, promote, compensate, and administer all employment practices without regard to medical condition or disability unrelated to the ability to perform a job with or without reasonable accommodation. Discrimination against job applicants or employees because they are disabled is prohibited and will not be tolerated. Every good faith effort will be taken by Company to fulfill the objectives of this policy.

All Pharmacannis employees must acknowledge that the dispensary is an alcohol, smoke, and drug-free workplace. All candidates for employment with Pharmacannis must undergo and pass both a state and federal background check prior to beginning work in the dispensary. Company will also implement policies to ensure that confidential information will be properly maintained.

PharmaCannis Massachusetts, Inc.
Management and Operations Profile
Operating Policies and Procedures

Training

Pursuant to 935 CMR 500.105(2), Pharmacannis will ensure that all agents complete training prior to performing job functions. Training will be tailored to the roles and responsibilities of the job function of each agent, and at a minimum will include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, Pharmacannis staff will receive eight hours of on-going training annually.

In accordance with 935 CMR 500.105(2)(b), all current owners, managers and employees of a Pharmacannis that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, will have attended and successfully completed a responsible vendor program to be designated a "responsible vendor." Once a licensee is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire. This program will then be completed annually and those not selling or handling marijuana may voluntarily participate. Records of responsible vendor training program compliance will be maintained for four years and made available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Personnel Records

Pursuant to 935 CMR 500.105(9)(d), 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, which will be maintained for at least 12 months after termination of the individual's affiliation with Pharmacannis and shall include, at a minimum, the following - All materials submitted to the Commission pursuant to 935 CMR 500.030(2); Documentation of verification of references; The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision, Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters; Documentation of periodic performance evaluations; A record of any disciplinary action taken; and Notice of completed responsible vendor and eight-hour related duty training - c) 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.

Employee Dismissal

The Chief Human Resources Officer will implement a policy pursuant to 935 CMR 500.105(1)(I) for the immediate dismissal of any marijuana establishment agent who has diverted marijuana, which shall be reported to law enforcement officials and to the Commission, engaged in unsafe

PharmaCannis Massachusetts, Inc.
Management and Operations Profile
Operating Policies and Procedures

practices with regard to the operation of the dispensary, which shall be reported to the Commission, or 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.

Qualification and Intended Training for Agents

General

Pursuant to 935 CMR 500.105(2)(a) Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") will ensure that all agents complete training prior to performing job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually. Once onboarded as a Pharmacannis employee, all dispensary agents will participate in an employee orientation prior to beginning work with the Company, which will include a summary overview of all the required training modules.

In accordance with 935 CMR 500.105(2)(b), all current owners, managers and employees of a Pharmacannis that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, will have attended and successfully completed a responsible vendor program to be designated a "responsible vendor." Once a licensee is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire. This program will then be completed annually and those not selling or handling marijuana may voluntarily participate. Records of responsible vendor training program compliance will be maintained for four years and made available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Certification Training Program Standards

Pursuant to 935 CMR 500.105(2)(b)(6), no owner or employee of a responsible vendor program shall have an interest in a Pharmacannis, program providers shall submit their programs to the Commission every two years for approval as a responsible vendor program, the program shall include at least two hours of instruction time, the program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified, the program provider shall maintain its training records at its principal place of business during the applicable year and for the following three years, the provider shall make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours, the program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee, attendees who can speak and write English must successfully pass a written test with a score of 70% or better, attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better, and program providers shall solicit effectiveness evaluations from individuals who have completed their program.

PharmaCannis Massachusetts, Inc.
Management and Operations Profile
Operating Policies and Procedures

Certification Training Class Core Curriculum

Pursuant to 935 CMR 500.105(2)(b)(7), responsible vendor training will include a discussion concerning marijuana effect on the human body, diversion prevention and prevention of sales to minors, including best practices, compliance with tracking requirements, identifying acceptable forms of ID, and key state laws and rules affecting owners, managers, and employees. All training records will be maintained in dispensary agent's personnel file and will be retrained for at least one year after the agent's termination.

Registration of Marijuana Establishment Agents

Pursuant to 935 CMR 500.030(1), Pharmacannis will apply for registration for all of its board members, directors, employees, executives, managers, and volunteers who are associated with the Company. The Commission shall issue a registration card to each individual determined to be suitable for registration. All such individuals shall: (a) be 21 years of age or older; (b) not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

Quality Control and Testing Procedures

In accordance with 935 CMR 500.140(9), Pharmacannis Massachusetts, Inc. ("Pharmacannis") will not sell or market any marijuana product (including marijuana) for adult use that has not been tested by an Independent Testing Laboratory first, except as allowed under 935 CMR 500.000. Testing of marijuana products will be performed by an Independent Testing laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana -infused products* as amended in 2016 by the DPH in compliance with 500.160(1). In accordance with 935 CMR 500.160(2), PharmaCannis will have a written policy responding to laboratory results that indicate contamination levels are above the acceptable limits established by DPH protocols identified in 935 CMR 500.160(1). The written policy will require that notification be provided to DPH and the notification communication will be in compliance with the requirements set forth under 935 CMR 500.160(2).

Pharmacannis will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 935 CMR 500.110 as required by 935 CMR 500.105(11)(a). The storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110 and will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest in compliance with 935 CMR 500.105(11)c). Pharmacannis will ensure that the dispensary has a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed in compliance with 935 CMR 500.105(11)(b).

PharmaCannis will provide employees with adequate and readily accessible toilet facilities that will be maintained in a sanitary condition and good repair as required by 935 CMR 500.105(3)(b)(13). The buildings, fixtures, and other physical facilities will be maintained in a sanitary condition as required by 935 CMR 500.105(3)(b)(8) and floors, walls, and ceilings will be constructed in a manner that allows them to be adequately kept clean and maintained in good repair as required by 935 CMR 500.105(3)(b)(6).

Pharmacannis water supply will be sufficient for the dispensary's operations as required by 935 CMR 500.105(3)(b)(11). In accordance with 935 CMR 500.105(3)(b)(12), the plumbing system for the dispensary will be of adequate size, design and adequately installed to maintained to carry sufficient quantities of water to required locations throughout the dispensary. Plumbing will properly convey sewage and liquid disposable waste from the dispensary. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(3)(b)(12). Litter and waste will be properly removed, disposed of so as to minimize the

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development of odor and minimize the potential for the waste attracting and harboring as required under 935 CMR 500.105(3)(b)(5).

Toxic items will be identified, held and stored in a manner that protects against contamination of marijuana as required by 935 CMR 500.105(3)(b)(10) and all products that can support the rapid growth of undesirable microorganisms are held in a manner that prevents the growth of such microorganisms as required by 935 CMR 500.105(3)(b)(14). The storage and transportation of finished products will be under conditions that will protect them against physical, chemical and microbial contamination as well as against deterioration of finished products or their containers in compliance with 935 CMR 500.105(3)(b)(15).

All edible products will be prepared, stored and handled in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standard for Food Establishment as required by 935 CMR 500.105(3)(c). In accordance with 935 CMR 500.105(3)(b)(1), Pharmacannis agents whose job responsibilities/duties includes contact with marijuana or nonedible marijuana products are subject to the requirements for food handlers specified in *105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. Agents working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including personal cleanliness and thorough hand-washing before starting work and at any other time when hands may have become soiled or contaminated as required by 935 500.105(3)(b)(2). The hand washing facilities within the dispensary will be adequate and convenient with running water at suitable temperatures and will conform to the requirements as required by 935 CMR 500.105(3)(b)(3). In addition, Pharmacannis will provide effective hand cleaning and sanitizing preparations, sanitary towel service or suitable drying devices to ensure employees maintain good sanitary practices. There will also be sufficient space for the placement of equipment and storage of materials as necessary for the maintenance of sanitary operations, as required by 935 CMR 500.105(3)(b)(4). All contact surfaces in the dispensary, including utensils and equipment, will be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9).

Record Keeping Procedures

In accordance with 935 CMR 500.105(9)(a) records of Pharmacannis Massachusetts, Inc. ("Pharmaannis") will be available for inspection by the Cannabis Control Commission ("Commission"), upon request. The records will be maintained in accordance with generally accepted accounting principles. Written records required and subject to inspection include, but are not limited to, any section of 935 CMR 500.00 and the following: (i) operating procedures as required by 935 CMR 500.105(1); (ii) inventory records as required by 935 CMR 500.105(1) and (iii) personnel records as required by 935 CMR 500.105(9)(d), which is discussed in greater detail below.

Personnel records will be maintained for each employee pursuant to 935 CMR 500.105(9)(d), including but not limited to: (i) job descriptions for each employee and volunteer positions; (ii) organizational charts consistent with job descriptions; (iii) materials submitted to the Commission as required by 935 CMR 500.030(2); (iv) documentation of required training; (v) staffing plan; (vi) background checks as required by 935 CMR 500.030; and (vii) personnel policies and procedures. Personnel records will be maintained for at least 12 months after termination of an individual's affiliation with PharmaCannis.

PharmaCannis will maintain business records as required under 935 CMR 500.105(9)(e). Business records will include manual or computerized records of (i) assets and liabilities; (ii) monetary operations; (iii) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, vouchers; (iv) Sales records including the quantity, form, and cost of marijuana products; (v) salary paid to each employee; (vi) stipend paid to each board member; and (vii) any executive compensation, bonus, benefit, or item of value paid to any individual affiliated or including members of the nonprofit corporation (if any) with the Marijuana Establishment.

Waste records will be maintained pursuant to 935 CMR 500.105(9)(f) and as required under 935 CMR 500.105(12)(d). Pharmacannis will ensure that at least two(2) Marijuana Agents are present to witness and document how waste was disposed of or otherwise handled (recycled, composted, etc.) in accordance with 935 CMR 500.105(12)(d). Pharmacannis will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names and signatures of the two Marijuana Establishment Agents present during the disposal or other handling when marijuana products or waste is disposed or handled. Pharmacannis will keep the records for at least three(3) years. The three(3) year period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

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Maintaining Financial Records

Pharmacannis Massachusetts, Inc. ("Pharmacannis") will maintain business records as required under 935 CMR 500.105(9)(e). Business records will include manual or computerized records of (i) assets and liabilities; (ii) monetary operations; (iii) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, vouchers; (iv) Sales records including the quantity, form, and cost of marijuana products; (v) salary paid to each employee; (vi) stipend paid to each board member; and (vii) any executive compensation, bonus, benefit, or item of value paid to any individual affiliated or including members of the nonprofit corporation (if any) with the Marijuana Establishment.

Pharmacannis will provide bi-annual sales data collected during the six months immediately preceding the application to the Commission in accordance with 935 CMR 500.140(6)(h). Separate accounting practices at the point-of-sale for marijuana and marijuana product sales and non-marijuana sales will be implemented as required by 935 CMR 500.140(6)(f).

Software or other methods that could be used to alter or manipulate sales data will not be utilized by Pharmacannis as required by 935 CMR 500.140(6)(c). In accordance with 935 CMR 500.140(6)(d) Pharmacannis will conduct monthly analysis of its equipment and sales data to ensure that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Records of performed monthly analysis will be maintained by Pharmacannis and available to the Commission upon request. Pharmacannis will do the following if it is determined that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: (i) immediately disclose the information to the Commission; (ii) cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and (iii) take such other action directed by the Commission to comply with 935 CMR 500.105.

Financial records will be maintained for a minimum of three(3) years from the due date of the return or the date the return is actually filed, whichever occurs later, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(6)(e).

Pharmacannis will maintain all records following the closure of the Marijuana Establishment for at least two years in a form and location acceptable to the Commission. The records will be maintained at the expense of Pharmacannis.

Diversity Plan

I. Intent

PharmaCannis Massachusetts, Inc (“PharmaCannis” or “the Company”) is committed to creating a diverse workforce that promotes equity among minorities, women, veterans, people with disabilities, and LGBTQ+ individuals. It is important to us to ensure that all individuals have the opportunity to be a part of our team. Furthermore, it is our belief that the more diverse and inclusive our team is, the more successful PharmaCannis will be in Massachusetts as we seek to utilize ideas and innovations from a variety of backgrounds, experiences and cultures.

II. Purpose

PharmaCannis’ Diversity Plan has been created to ensure that our hiring practices create a diverse and inclusive organization. We believe this plan will promote a discrimination-free work environment, that provides opportunities to all employees. In doing so, individuals will be able to apply their life experiences and talents to support the goals of the company.

PharmaCannis’ Diversity Plan is meant to be an evolving document designed to guide decisions and practices that ensure equal opportunity. The Diversity Plan represents an initial approach to establish a comprehensive management plan with goals and measures for inclusion and diversity. The Diversity Plan will be evaluated and modified, when necessary, as our company grows and expands.

Any actions taken, or programs instituted, by PharmaCannis will not violate the Cannabis Control Commission’s regulations with respect to limitations on ownership or control or other applicable state laws or regulations.

III. Proposed Initiatives, Goals and Metrics

GOAL 1: Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforce.

Proposed Initiative: As part of its hiring plan, PharmaCannis 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. To achieve this goal, PharmaCannis will;

- Create gender-neutral job descriptions
- Recruit from state and local groups

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- Post hiring needs in diverse publications such as a variety of web-based recruitment platforms
- Participate in local hiring events and job fairs
- 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.

PharmaCannis will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. PharmaCannis will engage with community groups and leaders to further identify ways in which to attract candidates that may not otherwise be aware of employment opportunities with PharmaCannis. To ensure that our workplace is an inclusive environment and to promote equity among our team, all hiring managers will undergo training to address bias and cultural sensitivity.

Metrics and Evaluation: PharmaCannis will assess the demographics of its employees to see if it is meeting its goal of increasing diversity in these positions. PharmaCannis will annually analyze the staffing makeup and based upon the outcome of those analytics, determine what steps are necessary to further increase the diversity of PharmaCannis. PharmaCannis will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, PharmaCannis will be able to demonstrate to the Commission the success of this initiative.

GOAL 2: Create a safe, accepting and respectful work environment.

Proposed Initiative: To accomplish this goal, PharmaCannis will require annual cultural sensitivity training for all employees including specific training for employees in management positions. Employees will be asked to fill out annual engagement surveys which will elicit feedback on PharmaCannis' work environment. Employees will be able to provide feedback to PharmaCannis at any time through the use of an anonymous suggestion box outside management offices for any employee who wishes to leave a suggestion but remain anonymous when doing so. This box will remain locked, so any suggestions left inside cannot be tampered with.

Metrics and Evaluation: PharmaCannis will collect and consider the feedback from the surveys and suggestion box. All comments and feedback will be documented and reviewed by senior management staff. PharmaCannis will conduct engagement surveys annually and review the results of these surveys within a month of administering them. The suggestion box will be checked at least on a weekly basis by either the CEO, COO, or approved corresponding human resources management of the company. The senior management staff, will identify the top 3-5 areas for improvement and, in collaboration with the PharmaCannis employees, develop goals (short and long term) on how to address those areas of development. This review of feedback

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and engagement surveys will enable PharmaCannis to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

GOAL 3: 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.

Proposed Initiative: To accomplish this goal, PharmaCannis will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minority groups; women, veterans, people with disabilities, and/or LGBTQ+ individuals.

Metrics and Evaluation: PharmaCannis will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by minorities, women, veterans, people with disabilities and/or LGBTQ+ individuals and will calculate the percentage of services and members of its supply chain who meet this requirement. PharmaCannis will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the targeted groups and give priority to these businesses. PharmaCannis' goal will be to work with at least 25% of businesses who identify as one of the target groups throughout its supply chain and services. PharmaCannis will assess these percentages annually and will be able to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

IV. Conclusion

PharmaCannis will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Diversity Plan. Any actions taken, or programs instituted by PharmaCannis will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.