



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281543
Original Issued Date: 07/16/2021
Issued Date: 07/16/2021
Expiration Date: 07/16/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: 4bros Inc

Phone Number: 315-717-6348
Email Address: Hasmukhpatelny@gmail.com

Business Address 1: 630 Beaulieu Street
Business City: Holyoke
Business State: MA
Business Zip Code: 01040
Business Address 2:
Mailing Address 1: 630 Beaulieu Street
Mailing City: Holuoke
Mailing State: MA
Mailing Zip Code: 01040
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business, Not a DBE

PRIORITY APPLICANT

Priority Applicant: no
Priority Applicant Type: Not a Priority Applicant
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD: 4bros Inc
Department of Public Health RMD Registration Number: RMD1325
Operational and Registration Status: Obtained Final Certificate of Registration, but is not 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: 25
Percentage Of Control:
Role: Owner / Partner
Other Role:
First Name: Gunvankumar
Last Name: Patel
Suffix:

User Defined Gender:

Specify Race or Ethnicity: india

Percentage Of Ownership: 25 **Percentage Of Control:**

Other Role:

Suffix:

User Defined Gender:

Specify Race or Ethnicity: india

Percentage Of Ownership: 25 Percentage Of Control:

Other Role:

Suffix:

User Defined Gender:

Specify Race or Ethnicity: india

Percentage Of Ownership: 25 Percentage Of Control:

Other Role:

Suffix:

User Defined Gender:

Specify Race or Ethnicity: india

No records found

CLOSE ASSOCIATES
No records found

No records found

CAPITAL RESOURCE
No records found

BUSINESS INTER
No records found

No records found

Establishment Address 1: 630 Beaulieu Street

Establishment City: Holyoke

Establishment Zip Code: 01040

Page: 2 of 6

Approximate square footage of the Establishment: 31500

How many abutters does this property have?: 9

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Cert HCA.pdf	pdf	5f5f67d2fa5f4a1c24d9d0c8	09/14/2020
Community Outreach Meeting Documentation	CO Attest Form.pdf	pdf	5f5f67d35837b61c2f648cc4	09/14/2020
Plan to Remain Compliant with Local Zoning	Compliant Plan.pdf	pdf	5f5f67d6ddc8bc2494c69fa6	09/14/2020
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	5f5f67d7781380244ebfad6b	09/14/2020
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	5f5f67d9ab637e1bff60d07a	09/14/2020
Community Outreach Meeting Documentation	Attachment C.pdf	pdf	5f5f67e6fa5f4a1c24d9d0cc	09/14/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	positive impact091320.pdf	pdf	5f5f681eddc8bc2494c69faa	09/14/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer Other Role:
First Name: Gunvankumar Last Name: Patel Suffix:
RMD Association: RMD Owner
Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role:
First Name: vipul Last Name: Patel Suffix:
RMD Association: RMD Owner
Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role:
First Name: hasmukhkumar Last Name: patel Suffix:
RMD Association: RMD Owner
Background Question: no

Individual Background Information 4

Role: Owner / Partner Other Role:

First Name: raju Last Name: Joshi Suffix:

RMD Association: RMD Owner

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	bylaws1.pdf	pdf	5d024254624ce5135e92679f	06/13/2019
Bylaws	bylaws2.pdf	pdf	5d02425d722cea17c1261188	06/13/2019
Articles of Organization	articleoforgan1.pdf	pdf	5d02426dbbb965134133bffe	06/13/2019
Articles of Organization	articleoforgan2.pdf	pdf	5d024276748dc71348c38c7b	06/13/2019
Department of Revenue - Certificate of Good standing	goodstandingdor.pdf	pdf	5d0249cec70e2b132b315813	06/13/2019
Secretary of Commonwealth - Certificate of Good Standing	goodstandingsec.pdf	pdf	5f5f73435837b61c2f648d0a	09/14/2020

No documents uploaded

Massachusetts Business Identification Number: 001283676

Doing-Business-As Name: East coast Pharms

DBA Registration City: Holyoke

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	busineplan3.pdf	pdf	5d024a01722cea17c12611b0	06/13/2019
Business Plan	busineplan4.pdf	pdf	5d024a0433099617d7945616	06/13/2019
Business Plan	busineplan1.pdf	pdf	5d024a07624ce5135e9267c8	06/13/2019
Business Plan	busineplan2.pdf	pdf	5d024a0a1dae681319cea913	06/13/2019
Plan for Liability Insurance	Plan Insurance.pdf	pdf	5f5f73ea853a241c0ed8e4fa	09/14/2020
Proposed Timeline	timeline091520.pdf	pdf	5f60e921c70203116b323abb	09/15/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Sample of unique identifying marks used for branding	LOGOformanufacturing.pdf	pdf	5d0252ee722cea17c12611db	06/13/2019
Security plan	SecurityUpdated827.pdf	pdf	5f5f74925837b61c2f648d10	09/14/2020
Storage of marijuana	storage plan090620.pdf	pdf	5f5f74930f99bf248957a019	09/14/2020
Inventory procedures	InventoryProcedure090620.pdf	pdf	5f5f7496ddc8bc2494c6a005	09/14/2020

Restricting Access to age 21 and older	21Over.pdf	pdf	5f5f749811000e2447afa425	09/14/2020
Prevention of diversion	Diversion.pdf	pdf	5f5f754dfa5f4a1c24d9d118	09/14/2020
Quality control and testing	QCTesting090620.pdf	pdf	5f5f754d91bd17247e206bba	09/14/2020
Dispensing procedures	DispensingPro090620.pdf	pdf	5f5f754e5837b61c2f648d14	09/14/2020
Personnel policies including background checks	Personnel Policy090620.pdf	pdf	5f5f754f0f99bf248957a01d	09/14/2020
Record Keeping procedures	Record Keeping.pdf	pdf	5f5f7550bc3a3b1be23de0d3	09/14/2020
Maintaining of financial records	Financial Records090620.pdf	pdf	5f5f75c4bc3a3b1be23de0d9	09/14/2020
Qualifications and training	Qualificaion and training090620.pdf	pdf	5f5f75c4ddc8bc2494c6a00b	09/14/2020
Separating recreational from medical operations, if applicable	separating091320.pdf	pdf	5f5f75c6781380244ebfadc8	09/14/2020
Plan to Obtain Marijuana	Plan to obtain.pdf	pdf	5f5fa064bead71246fcd2a5b	09/14/2020
Types of products Manufactured.	producttype.pdf	pdf	5f5facf411000e2447afa56e	09/14/2020
Transportation of marijuana	TransportationPlan091520.pdf	pdf	5f60e93ac70203116b323abf	09/15/2020
Diversity plan	Diversity Plan 091220.pdf	pdf	5f60e98d3d790d1949d5e362	09/15/2020
Method used to produce products	ProductionMethod091520.pdf	pdf	5f60f4ae8dc8ce197183c9f7	09/15/2020

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

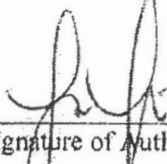
Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 5:00 PM

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, Jorge Tirse, (insert name) certify as an authorized representative of 4BROS Inc (insert name of applicant) that the applicant has executed a host community agreement with City of Holyoke (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 5/9/18 (insert date).


Signature of Authorized Representative of Applicant

Host Community

I, Mayor Alex B. Morse, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Holyoke (insert name of host community) to certify that the applicant and 4BROS Inc d/b/a East Coast Pharms (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on May 9, 2018 (insert date).


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, Jorge Tirse, (insert name) attest as an authorized representative of 4bros Inc dba East Coast Plants (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on January 29, 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on 1/20/19 to 1/27/19 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on 1/20/19 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on 1/21/19 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

Ensure compliance with local zoning codes and regulations

The location of this property is situated in the IG (General Industry) zone which has been approved by the City of Holyoke for an RMD and adult-use location. We have met with multiple city departments including Planning board, Economic Development, and the Mayors office on our plans and they have provided us with a letter of full support and non-opposition. Holyoke has approved set rules and regulations for the special permit which we have attached. We have submitted all documents requested by the city to the city and have been issued a special permit to proceed.

We will maintain compliance with the local codes, ordinances and bylaws by following the set of regulations provided. Our director will be in direct contact to stay compliant as we progress and will submit an annual compliance report to the city clerk as agreed.

Police Department has approved our security plan and we have updated it as needed. We are in constant contact with the city to stay in compliance with the requirements set forth.

Dated 01/27/2020



Brenna Murphy McGee MMC, City Clerk
Irma L. Cruz, Assistant City Clerk

OFFICE OF CITY CLERK

RECEIVED
2018 SEP 21 A 9:04
CITY OF HOLYOKE
CITY CLERK'S OFFICE

Date: August 28, 2018

Re: Jorge Tirse
630 Beaulieu St.
Holyoke, MA 01040

Special Permit granted to Jorge Tirse to operate a RMRE and MMD and MME for medical and recreational marijuana purposes at 630 Beaulieu St. Holyoke, MA 01040

I hereby certify that as of the above date no appeals have been filed in this office.

A true copy attest:

Brenna Murphy McGee

City Clerk

Special Permit

A Special Permit which was granted to Jorge Tirse, to operate a RMRE and MMD and MME for medical and recreational marijuana purposes at 630 Beaulieu St., Holyoke MA 01040.

Petitioner: Jorge Tirse
53 Park St.
Gloversville, NY 12078

Parcel: 630 Beaulieu St.
Parcel #055 00 003
Book/Page 13257/144

- Conditions: 1. That the owner of the building always pay commercial property tax rate to the extent allowed by the Federal, State, and Local laws for the duration of the Sp. Permit
2. That the business retain a minimum 30% Holyoke residents for of non-security jobs
3. That hiring preference be given to security personnel that are retired Holyoke Police or are a retired member of another police department now lives in the City of Holyoke.
4. There shall be no marijuana consumption to allowed on site.
5. There shall be no deliveries of retail or medical marijuana from the site to individual homes, residences or people.

Granted by the City Council on August 7, 2018 by a vote of the Yeas 12, Nays 0, Absent 1 (McGee)

**In order for this permit to be effective, the approved special permit must be recorded at the Hampden County Registry of Deeds and the costs of recording paid by the owner or applicant. A SPECIAL PERMIT WILL NOT TAKE EFFECT UNTIL IT IS RECORDED AT THE HAMPDEN COUNTY REGISTRY OF DEEDS.

***AFTER RECORDING, PLEASE RETURN A COPY TO THE CITY CLERK

Brenna Murphy McGee

Brenna Murphy McGee
Holyoke City Clerk

RECEIVED
2018 SEP 21 A 9:04
CITY OF HOLYOKE
CITY CLERK'S OFFICE

IN THE YEAR TWO THOUSAND AND SEVENTEEN

ONE HUNDRED AND THIRTY-FIFTH AMENDMENT TO APPENDIX A OF THE
REVISED CODE OF ORDINANCES OF THE CITY OF HOLYOKE,
MASSACHUSETTS 1997

AN ORDINANCE

Be it ordained by the City Council of the City of Holyoke as follows:

SECTION 1. Appendix A entitled "Zoning" of the Revised Code of Ordinances of the City of Holyoke, Massachusetts, 1997, as amended, is hereby further amended by the following:

DELETING: Section 7-10 in its entirety

ADDING: in its place the following:

7.10 MARIJUANA FACILITIES

7.10.1 Purpose.

It is recognized that the nature of the substance cultivated, processed, tested and/or sold by marijuana establishments have operational characteristics that require they be sited in such a way as to ensure the health, safety, and general well-being of the public. The imposition of reasonable safeguards and regulation of the time, place and manner of marijuana establishments is necessary to advance these purposes.

Subject to the provisions of this Zoning Ordinance, Massachusetts General Laws Chapter 40A, 105 CMR 725.000 and Chapter 94G, marijuana establishments will be permitted to do business within the City of Holyoke that meet state regulations as established by the MA Department of Public Health and Cannabis Control Commission.

Nothing in this Section shall be interpreted as regulating the growing, processing or fabrication of products that are not regulated as a controlled substance by the Massachusetts Cannabis Control Commission and/or the Department of Public Health.

7.10.2 Marijuana Establishments - Definitions

The following will be defined subcategories of Marijuana Establishments:

Marijuana Manufacturing Establishment (MME): A use operated by an entity duly licensed by the Cannabis Control Commission in accordance with M.G.L. c. 94G or by the MA Department of Public Health in accordance with 105 CMR 725.000, and pursuant to all other applicable state laws and regulations, that cultivates, possesses, processes (including development of related products such as food, tinctures, aerosols, oils, or ointments), transfers or transports marijuana or products containing marijuana.

The cultivation and processing of marijuana in accordance with this definition is considered to be a manufacturing use and is not agriculturally exempt from zoning.

Medical Marijuana Dispensary (MMD): A use operated by an entity registered and approved by the MA Department of Public Health in accordance with 105 CMR 725.000, and pursuant to all other applicable state laws and regulations, also to be known as a medical marijuana treatment center, that that sells, distributes, dispenses, or administers marijuana, products containing marijuana, or related supplies specifically for medical purposes. .

Recreational Marijuana Retail Establishment (RMRE): A use operated by an entity duly licensed by the Cannabis Control Commission in accordance with M.G.L. c. 94G, and pursuant to all other applicable state laws and regulations, that sells, distributes, dispenses, administers or allows for the on-site consumption of marijuana, products containing marijuana, or related supplies for retail sales for non medical purposes.

Marijuana Testing Facility (MTF): An entity duly licensed by the Cannabis Control Commission in accordance with M.G.L. c. 94G, and pursuant to all other applicable state laws and regulations, that tests marijuana and marijuana products, including certification for potency and the presence of contaminants.

7.10.3 Applicability

This Section applies to all marijuana establishments, which include: Marijuana Manufacturing Establishments (MME), Medical Marijuana Dispensaries (MMD), Recreational Marijuana Retail Establishments (RMRE) and Marijuana Testing Facilities (MTF).

7.10.4 Permitted Districts

Any and all marijuana establishments may only be allowed in the IG zone by special permit of the City Council

7.10.5 Operational Requirements

1) Use:

- a) Marijuana establishments may only use their designated square footage for the purposes of operating such an establishment, as encompassed in this Ordinance.
- b) No marijuana shall be smoked, eaten or otherwise consumed or ingested within the premises except at RMRE's, as defined.
- c) Operations, including deliveries to and from any marijuana facility, may not occur within the hours of 8:00 p.m. to 8:00 a.m.

2) Physical Requirements:

- a) All aspects of marijuana establishment must take place at a fixed location within a fully enclosed building.
- b) No outside storage is permitted.
- c) No MMD or RMRE shall have a gross floor area in excess of 5,000 square feet.

d) Ventilation – all marijuana establishments shall be ventilated in such a manner that no:

- i) pesticides, insecticides or other chemicals or products used in the cultivation or processing are dispersed into the outside atmosphere
- ii) no odor from marijuana cultivation, processing or consumption can be detected by a person with an unimpaired and otherwise normal sense of smell at any adjoining use or adjoining property to the marijuana establishment.

e) All signage shall comply with 105 CMR 725.00, Cannabis Control Commission regulations and Section 6.4 “Signs.”

3) Location:

- a) A MMD shall not be located in buildings that contain any pharmacy, medical doctor offices or the offices of any other professional practitioner authorized to prescribe the use of medical marijuana.
- b) A marijuana establishment shall not be located in buildings that contain any residential units, including transient housing such as hotels, motels and dormitories.

4) Issuance/Transfer/Discontinuance of Use:

- a) A special permit shall be valid only for the registered entity to which the approval was issued and only for the site on which the marijuana establishment has been authorized.
- b) A special permit shall be non-transferable and shall have a term limited to the applicant's ownership or control of the premises as a marijuana establishment.
- c) Permitted marijuana establishments shall file an annual report to the City Clerk's Office no later than January 31st, providing a copy of all current applicable state licenses for the establishment and/or its owners and demonstrating continued compliance with the conditions of the special permit.
- d) A special permit shall lapse if the applicant ceases operation for a period of 180 days of the marijuana establishment and/or if the applicants' registration by Department of Public Health or licensure by the Cannabis Control Commission has been revoked, expires, is terminated, is transferred to another controlling entity or is relocated to a new site.
 - i) The applicant shall notify the Zoning Enforcement Officer and City Clerk in writing within 48 hours of such lapse, cessation, discontinuance or expiration.
- e) A marijuana establishment shall be required to remove all material, plants, equipment and other paraphernalia upon registration or licensure revocation, expiration, termination, transfer to another controlling entity or relocation to a new site and any other cessation of operation as regulated by the Department of Public Health or the Cannabis Control Commission. Such removal will be in compliance with 105 CMR 725.105 (J), (O) and regulations from the CCC.

7.10.6 APPLICATION PROCEDURE AND REQUIREMENTS

1) *Application Requirements:* An application for a special permit shall include the following:

- a) The name and address of each owner of the marijuana establishment.
- b) Copies of all required registrations, licenses and permits issued to the applicant by the Commonwealth of Massachusetts and any of its agencies for the establishment.
- c) Evidence that the Applicant has site control and right to use the site for a marijuana establishment in the form of a deed or valid purchase and sales agreement or, in the case of a lease a notarized statement from the property owner and a copy of the lease agreement.
- d) A notarized statement signed by the marijuana establishment organization's Chief Executive Officer and corporate attorney disclosing all of its designated owners, including officers, directors, partners, managers, or other similarly-situated individuals and entities and their addresses. If any of the above are entities rather than persons, the Applicant must disclose the identity of all such responsible individual persons.
- e) A description of all activities to occur on site, including but not limited to: cultivating and processing of marijuana and marijuana infused products (MIPs), on-site sales, delivery of marijuana and related products to off-site facilities, off-site direct delivery to patients, distribution of educational materials, and other programs or activities.
- f) A written notice from the Chief of Police shall be submitted to the City Clerk stating that an acceptable Security Plan has been reviewed and approved. The Security Plan shall include the location and details of all security measures for the site, including but not limited to lighting, fencing, gates, waste disposal, alarms and similar measures ensuring the safety of employees and patrons and to protect the premises from theft or other criminal activity.
- g) Details of all proposed exterior security measures for the marijuana establishment.
- h) A Development Impact Statement containing all the information required under Section 10.1.6 (1) of the Zoning Ordinance.
- i) A Traffic Impact Statement containing all of the information required under Section 10.1.6 (2) of the Zoning Ordinance.
- j) A special permit fee in the amount of \$500.00.

2) *Site Plan:* The special permit application shall include a Site Plan prepared by a Massachusetts registered Architect, Landscape Architect, Professional Engineer or other appropriate design professional. The site plan shall include the following components and information:

- a) **Locus Plan.** A locus plan showing the entire proposed development and its relation to existing areas, buildings and roads for a distance of 300 feet from the boundaries of the proposed development or such other distance as may be approved or required by the City Council. The plan shall also show all contiguous land owned by the applicant or by the owner of the property which is the subject of the application.

b) **Improvements Plan.** A plan depicting all existing and proposed buildings, driveways or roads, parking areas, service areas, refuse collection areas, sidewalks, paths, landscaping etc.

c) **Building Plan.** A detailed floor plan showing square footages for each use within the marijuana establishment.

d) **Details.** Detail sheets including, but not limited to, pavement markings, lighting fixtures, fencing, dumpster enclosures, signage (temporary and permanent), and any site improvements included in plans (a) -- (c) above.

3) *Review Procedure:* upon receipt of an application, the City Clerk shall forward a copy for review and comment to Building Department, Fire Department, Police Department, Engineering Department, Water Department, Board of Health, Planning Board and the Stormwater Authority and Conservation Commission if applicable. The Departments shall review the application and provide comments back to the City Council within twenty-one (21) calendar days. City Council shall, if needed, confer with the Public Safety Committee for review and comment.

4) *New construction:* in cases of new construction, in addition to the requirements of this Section, see Section 10.0 SITE PLAN REVIEW of the Holyoke Zoning Ordinance. The Applicant may need to file with the Stormwater Authority, a Stormwater Management Permit Application, per the Stormwater Regulations.

7.10.7 FINDINGS

1) In addition to the standard Findings for a Special Permit under Section 9.3.2, the City Council must also find all the following:

a) That the marijuana establishment is designed to minimize any adverse impacts on abutters and other parties in interest.

b) That the marijuana establishment demonstrates that it will meet all the permitting requirements of all applicable agencies within the Commonwealth of Massachusetts and will be in compliance with all applicable state laws and regulations.

c) That the applicant has satisfied all of the conditions and requirements of this Section and other applicable Sections of this Ordinance.

d) That the marijuana facility project meets a demonstrated need of the community.

e) That the marijuana establishment provides adequate security measures to ensure that no individual participant will pose a direct threat to the health or safety of other individuals, and that the storage and/or location of marijuana product is adequately secured.

f) That the marijuana establishment adequately addresses issues of traffic demand, circulation flow, parking and queuing, particularly at peak periods at the establishment, and its impact on neighboring uses.

7.10.8 Enforcement

Any violation of this Section shall be enforced in accordance with Section 9-1 of the Zoning Ordinance.

SECTION 2. All ordinances or parts of ordinances inconsistent herewith are hereby repealed.

SECTION 3. This ordinance shall take effect on the date of passage.

APPROVED AS TO FORM:

A handwritten signature in cursive script, appearing to read "Crystal Barnes", is written over a horizontal line.

Crystal Barnes
Assistant City Solicitor

City of Holyoke
Purchasing Department
538 Dwight Street #15
Holyoke, MA 01040-5078
(413)-322-5650
FOR SALE

INDIVIDUAL REAL ESTATE IN HOLYOKE, MA

Separate sealed proposals for the sale of: 55 Hamilton St.: 2019-005, 277 Main St.: 2019-006, 285 Main St.: 2019-007, 405 Main St.: 2019-008, 88 Beech St.: 2019-009, 689 Main St.: 2019-010 will be received by the Chief Procurement Officer, Room 15, Holyoke City Hall, Holyoke, MA 01040 up to February 20, 2019 at 2PM in which time they will be publicly opened and read. In the event City Hall is closed due to weather or unforeseen circumstances the bid opening will be held on the next business day at the same time.

Documents will be available electronically on January 16, 2019 after 10:00 AM by contacting belanger@holyoke.org and/or sheridan@holyoke.org.

The City of Holyoke reserves the right to reject any and all proposals.
1/18, 1/25/19

City of Holyoke
Purchasing Department
538 Dwight Street #15
Holyoke, MA 01040-5078
(413)-322-5650
FOR SALE

INDIVIDUAL REAL ESTATE IN HOLYOKE, MA

Separate sealed proposals for the sale of: 2019-001 144 High Street, 2019-002 47 Chapin Street, 2019-003 Vernon Street (Springdale Turn Hall), and 2019-004 229 Beech Street will be received by the Chief Procurement Officer, Room 15, Holyoke City Hall, Holyoke, MA 01040 up to February 21, 2019 at 2PM in which time they will be publicly opened and read. In the event City Hall is closed due to weather or unforeseen circumstances the bid opening will be held on the next business day at the same time.

Documents will be available electronically on January 16, 2019 after 10:00 AM by contacting belanger@holyoke.org and/or sheridan@holyoke.org. The City of Holyoke reserves the right to reject any and all proposals.
1/18, 1/25/19

COMMUNITY OUTREACH MEETING

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for January

29, 2019 at 1 p.m. at Nueva Esplananza, 401 Main Street, Holyoke, MA 01040. The proposed Retail, Manufacturing and Cultivation facility is anticipated to be located at 630 Beaulieu Street, Holyoke. There will be an opportunity for the public to ask questions.
1/18/19

Commonwealth of
Massachusetts
The Trial Court
Hampden Probate and
Family Court

Docket No. HD19P0067PM
In the matter of:
TIANNA M CRUZ
Of: Holyoke, MA
RESPONDENT
(Person to be Protected/
Minor)

CITATION GIVING
NOTICE OF PETITION
FOR APPOINTMENT OF
CONSERVATOR OR OTHER
PROTECTIVE ORDER
PURSUANT TO G.L. c. 190B,
§§-304 & §-405

To the named Respondent and all other interested persons, a petition has been filed by Jeanette Santiago of Holyoke, MA in the above captioned matter alleging that Tianna M Cruz is in need of a Conservator or other protective order and requesting that Jeanette Santiago of Holyoke, MA (or some other suitable person) be appointed as Conservator to serve With Surety on the bond.

The petition asks the court to determine that the Respondent is disabled, that a protective order or appointment of a Conservator is necessary, and that the proposed conservator is appropriate. The petition is on file with this court.

You have the right to object to this proceeding. If you wish to do so, you or your attorney must file a written appearance at this court on or before 10:00 a.m., on the return date of 02/06/2019. This day is NOT a hearing date, but a deadline date by which you have to file the written appearance if you object to the petition. If you fail to file the written appearance by the return date, action may be taken in this matter without further notice to you. In addition to filing the written appearance, you or your attorney must file a written affidavit stating the specific facts and grounds of your objection within 30 days after the return date.

IMPORTANT NOTICE
The outcome of this proceeding may limit or completely take away the above-named person's right to make decisions about personal

affairs or financial affairs or both. The above-named person has the right to ask for a lawyer. Anyone may make this request on behalf of the above-named person. If the above-named person cannot afford a lawyer, one may be appointed at State expense.

WITNESS, Hon. Barbara M Hyland, First Justice of this Court.
Date: January 10, 2019

Suzanne T. Seguin
Register of Probate
1/18/19

Commonwealth of
Massachusetts
The Trial Court
Hampden Probate and
Family Court
50 State Street
Springfield, MA 01103
(413)748-7758
Docket No. HD19P0064EA

Bruce Gloutak
Date of Death: 11/16/2017
CITATION ON PETITION
FOR FORMAL
ADJUDICATION

To all interested persons:
A Petition for Formal Probate of Will with Appointment of Personal Representative has been filed by Marcia Cassidy of Holyoke, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that: Marcia Cassidy of Holyoke, MA be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in an unsupervised administration.

IMPORTANT NOTICE
You have the right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m., on the return date of 02/06/2019.

This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

**UNSUPERVISED
ADMINISTRATION UNDER
THE MASSACHUSETTS
UNIFORM PROBATE CODE
(MUPC)**

A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts

with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS, Hon. Barbara M Hyland, First Justice of this Court.
Date: January 09, 2019

Suzanne T. Seguin
Register of Probate
1/18/19

**LEGAL NOTICE
CITY OF HOLYOKE
GAS & ELECTRIC
DEPARTMENT
HYDRAULIC TURBINE
MECHANICAL
MAINTENANCE & REPAIRS
ON-CALL SERVICES
ANNUAL CONTRACT**

Sealed bids for the above annual contract will be received by Holyoke Gas & Electric Dept., until 10:00 a.m. January 31, 2019 at the Office of the Manager, 99 Suffolk St., Holyoke, MA 01040, at which time bids will be publicly opened and read.

A Bid Deposit in the amount of \$25,000 must accompany all bids and may be in the form of a certified, treasurer's, or cashier's check payable to HG&E from a responsible bank or trust company; cash; or a bid bond from a licensed surety payable to HG&E.

Prevailing Wage Rates:
Rates, which are to apply to the work, are set by the MA Dept. of Labor & Industries.

Additional information may be obtained from:

Yocelyn F. Delgado
Holyoke Gas & Electric Dept.
99 Suffolk St.
Holyoke, MA 01040
(413) 536-9308

ydelgado@hgced.com
The right is hereby reserved to reject any or all proposals, or to accept any proposal that in the opinion of the Manager may be for the best interest of the City of Holyoke.

Please mark sealed envelopes "Bid for Hydraulic Turbine Mechanical Maintenance & Repairs On-Call Services Annual Contract" and address them to:

James M. Lavelle, Manager
Holyoke Gas & Electric Dept.
99 Suffolk St.
Holyoke, MA 01040
1/18/19

Commonwealth of
Massachusetts
The Trial Court
Hampden Probate and

Family Court
50 State Street
Springfield, MA 01103
(413)748-7758
Docket No. HD19P0017EA

State of
William G Lafleur
Also known as:
William Lafleur

Date of Death: 11/06/2018
CITATION ON PETITION
FOR FORMAL
ADJUDICATION

To all interested persons:
A Petition for Formal Probate of Will with Appointment of Personal Representative has been filed by Daniel R Lafleur of North Haven, CT requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that: Daniel R Lafleur of North Haven, CT be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in an unsupervised administration.

IMPORTANT NOTICE
You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m., on the return day of 02/01/2019.

This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

**UNSUPERVISED
ADMINISTRATION UNDER
THE MASSACHUSETTS
UNIFORM PROBATE CODE
(MUPC)**

A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS, Hon. Barbara M Hyland, First Justice of this Court.
Date: January 04, 2019

Suzanne T. Seguin
Register of Probate
1/18/19

Commonwealth of
Massachusetts
The Trial Court
Hampden Probate and
Family Court
50 State Street
Springfield, MA 01103
Docket No. HD18D1503DR

Jackeline Santos
Maldonado vs.
Domingo De La Rosa Ozuna
DIVORCE SUMMONS
BY PUBLICATION
AND MAILING

To the Defendant:
The Plaintiff has filed a Complaint for Divorce requesting that the Court grant a divorce for Irretrievable Breakdown. The Complaint is on file at the Court.

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

You are hereby summoned and required to serve upon:
Jackeline Santos
Maldonado

62 B Bay Meadow Road
Springfield, MA

Your answer, if any, on or before 04/15/2019, if you fail to do so, the court will proceed to the hearing and adjudication of this action. You are also required to file a copy of your answer, if any, in the office of the Register of this Court.

WITNESS, Hon. Barbara M Hyland, First Justice of this Court.
Date: January 10, 2019

Suzanne T. Seguin
Register of Probate
1/18/19

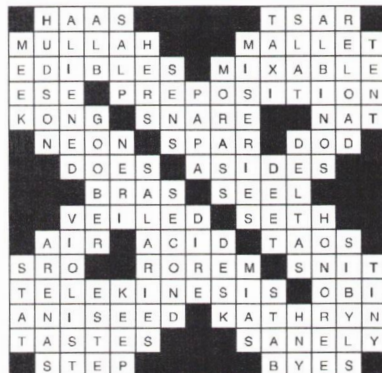
LEGAL NOTICE
The Holyoke Stormwater Authority will hold a public hearing on Wednesday, January 23, 2019 at 5:00 PM in the DPW Conference Room located at 63 Canal Street, Holyoke, MA. The purpose of the hearing is to accept public comment on a Stormwater Permit Application by MIFA Victory Theatre, LLC in accordance with the City of Holyoke Stormwater Regulations. The property is located on 87 Suffolk Street and 134 Chestnut Street, Holyoke, MA and the project consists of restoration and additions to Victory Theatre and parking and site improvements. A copy of the application and attachments are available in the Holyoke Engineering Department office, 20 Korean Veterans Plaza, City Hall Annex, Room 300, between the hours of 8:30 A.M. and 4:30 P.M. Monday - Friday. 1/18/19

HOW TO SUBMIT PUBLIC NOTICES

All public notices to be published in the Holyoke Sun should be sent directly to notice@turley.com. Jamie Joslyn processes all public notices for this newspaper and can answer all of your questions regarding these notices. Please indicate the newspapers and publication date(s) for the notice(s) in the subject line of your email. For questions regarding coverage area, procedures or cost, please call Jamie directly at 413-283-8393.

Turley Publications, Inc. publishes 14 weekly newspapers throughout Western Massachusetts. Visit www.turley.com for more information.

Please check the accuracy of your public notice prior to submission (i.e., date, time, spelling). Also, be sure the requested publication date coincides with the purpose of the notice, or as the law demands. Thank you.



The Sun OBITUARY POLICY

Turley Publications offers two types of obituaries.

One is a free, brief **Death Notice** listing the name of deceased, date of death and funeral date and place.

The other is a **Paid Obituary**, costing \$120, which allows families to publish extended death notice information of their own choice and may include a photograph. **Death Notices & Paid Obituaries** should be submitted through a funeral home to: obits@turley.com.

Exceptions will be made only when the family provides a death certificate and must be pre-paid.

WE'VE EXPANDED OUR WEB SITE PUBLIC NOTICES ARE NOW ONLINE

1 Email all notices to notice@turley.com

2 Access archives and digital tear sheets by newspaper title.

3 Find a quick link to the state of Massachusetts' public notice web site to search all notices in Massachusetts newspapers.

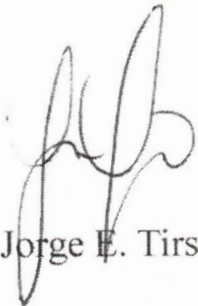
Public notice deadlines are Mondays at noon, Fridays noon for Monday holidays.

visit www.publicnotices.turley.com

Municipal
NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for January 29th 2019 At 1pm at Nueva Espenranza, 401 Main Street, Holyoke, MA 01040 . The proposed Retail, Manufacturing and Cultivation facility is anticipated to be located at 630 Beaulieu Street, Holyoke.


There will be an opportunity for the public to ask questions.



Jorge E. Tirse

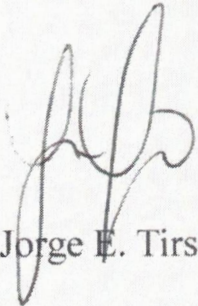
RECEIVED
2019 JAN 22 A 9:20
CITY OF HOLYOKE
CITY CLERK'S OFFICE

NOTICE



Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for January 29th 2019 At 1pm at Nueva Espenranza, 401 Main Street, Holyoke, MA 01040 . The proposed Retail, Manufacturing and Cultivation facility is anticipated to be located at 630 Beaulieu Street, Holyoke.

There will be an opportunity for the public to ask questions.



Jorge E. Tirse

Positive Impact Plan

Goals:

East Coast Pharms is committed to working with local groups and/or organizations that directly impact Holyoke in a positive way to reduce barriers and create opportunity within this community.

This plan is to positively impact areas of disproportionate impact as defined by the commission, by;

1. Encouraging local training and internships in collaboration with local organizations and/or groups to reduce barriers in the industry.
2. Working with local organization to provide Job opportunities directly to residents of Holyoke.
3. Host a community involved clean-up throughout Holyoke.

Programs:

1. We have partnered with the Senior Project Manager of Planning and Economic Development for the city of Holyoke to work in collaboration with Holyoke Freight Farms and other local cannabis businesses.
 - Holyoke Freight Farms has a knowledge based course offered to residents looking for employment in the industry.
 - They provide a course on indoor controlled environment growing. Part of the course includes hands-on training in a controlled environment container.
 - We will help and provide our facility for additional training in conjunction with other programs and training courses that may help someone wanting to work in the industry.
 - Hiring preference will be given to Holyoke residents.
2. East Coast Pharms will be working with Nueva Esperanza, Inc.
 - We will utilize Nueva Esperanza organization to reach out and seek individuals for employment. This organization is located in South Holyoke the heart of the impacted community.

- We will advertise in the local “El Sol” newspaper about employment opportunities in bi-lingual, monthly.
 - We will host job fairs with Nueva Esperanza at their community center on Main Street every 6 months. We will be making Nueva Esperanza our home base for employment seekers. We'll educating, encouraging and helping individuals with past records by assisting them with resources and procedures to achieve this.
 - We will help individuals looking to get into the business with resources, training and guidance (ie Social Equity/Empowerment applicants, and any disproportionate impacted community residents), to meet and exceed our social equity responsibility.
4. Clean up campaign aligned with our community partners to help keep Holyoke streets cleaned.
- Spring Cleanup, Fall Cleanup.
 - East Coast Pharms staff and partners will lead a team to clean an area mapped by our community partners.
 - Community partner will establish separate teams to clean different areas.

Measurements of Goals:

Information that will collected in achieving our goals. ***All collected information will be kept in compliance to the commissioners rules on yearly renewal and reporting.***

1. ECP will keep track of how many people have trained and/or hired through this training program as well as., How many people live in Holyoke which is an area of disproportionate impact. Our goal is to hire 50% or more from Holyoke, which is an area of disproportionate impact.
2. How many employees were hired from Job referrals from Nueva Esperanza Organization? Our goal is to reach a 20% referred hire. How many employees are from an area that was disproportionately impacted? Our goal is to hire 50% or

more from these areas. Metrics will be kept in order to be in compliance. Monthly advertisements will be published in bi-lingual, in the local free paper “El Sol” , Holyoke.

3. We will keep track of how many staff and community volunteers joined the clean up effort. We will track how many bags of garbage was collected. Our goal is to have one community member per staff starting with 10 staff members and ten community members. Our goal is to do a clean up for spring and fall and adding an additional 10% to the volunteers each time after the first.

As a Hispanic male that has been through the system, I understand the harm that was done in largely populated cities where systematic barrier stopped the equity and growth in minority communities. The war on drugs affected diverse communities through its justice system, harming Americans and causing a systematic lack of opportunities. Our goal is to educate and bring those opportunities back.

The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and

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

**STATEMENT OF INCORPORATOR
IN LIEU OF ORGANIZATION MEETING
OF
4BROS INC**

THE UNDERSIGNED, being the Authorized Person ("Incorporator") of 4BROS INC, a corporation of the State of Massachusetts does hereby adopt the following resolutions and takes the following action by written consent in lieu of a meeting.

RESOLVED, that a copy of the Certificate of Formation of 4BROS INC, as filed in the Office of the Secretary of State of Massachusetts on July 25, 2017 be, and the same hereby is, ordered filed in the minute book of the corporation; and

RESOLVED that the number of initial Directors forming this corporation shall be at least one (1); and


RESOLVED, that from July 25, 2017 hence, the undersigned has fulfilled the duties of Incorporator and relinquishes all further duties to the Directors/Officers of 4BROS INC, and

RESOLVED, that simultaneous with the Incorporator's transfer of all further duties to the Directors/Officers, the said Incorporator resigns such office effective July 25, 2017; and

RESOLVED, that the following named persons shall constitute the initial Directors of 4BROS INC:

Gurvant Kumar Patel

Signed and executed by the Incorporator on July 25, 2017.

A handwritten signature in black ink, appearing to read 'Sonia B', is written over a horizontal line.

Sonia Becerra, Incorporator

CORPORATE BYLAWS

OF

4bros Inc

These are general Bylaws that have been customized with your company's information. These Bylaws should be reviewed and edited by the company's Board of Directors and/or attorney to meet your company's specific needs and to conform to any statutory changes before adoption.

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CORPORATE BYLAWS

OF

4bros Inc

Article 1---Organization

- 1.1 **PRINCIPAL OFFICE.** The principal office of the Corporation will be determined by the Board of Directors. Other offices may also be established at such places that the Board deems necessary for the conduct of business. A copy of these bylaws will be kept at the principal office.
- 1.2 **REGISTERED AGENT.** The name and address of the Registered Agent is provided in the Articles of Incorporation that was filed with the Secretary of State. The Registered Agent may only be changed by filling out the appropriate paperwork with the Secretary of State. Each change of Registered Agent must be approved by the Board of Directors.
- 1.3 **BYLAWS AMENDMENTS.** These Bylaws may be amended by the shareholders or Board of Directors. Notice of all changes must be given to the shareholders before the next Shareholder's meeting after the adoption of the changes.

Article 2---Shareholder's Meetings

- 2.1 **ANNUAL MEETING.** On the anniversary of the Corporation's formation, an annual meeting of the Shareholders will be held at the principal place of business or at an alternate location chosen by the Board of Directors.
- 2.2 **PURPOSE OF ANNUAL MEETING.** The purpose of the annual meeting will be the election of Board members and to address other issues that require shareholder approval.

2.3 TELEPHONE MEETINGS. When necessary or desired, Shareholders may elect to meet via conference call or any other means where all participants can hear each other. Decisions made at such meetings will have the same authority and power as a decision made at meetings where the participants were physically present.

2.4 ACTION WITHOUT A MEETING. Any action that may be taken at a meeting of the Shareholders may be taken without a meeting if all members entitled to vote, in writing, files consent to the action with the Secretary of the Corporation. All such actions will have the same authority and power as actions passed at meetings where the participants were physically present. Consent documents will be kept in the Corporate Record Book at the principal place of business.

2.5 NOTICE OF MEETING. The Board or person calling a meeting of the shareholders will provide notice of the meeting no less than 10 days before the meeting to all shareholders who have a right to vote. A shareholder or group of shareholders must hold at least 10 percent of the shares entitled to vote in order to call a meeting. The notice must include the date, time, and place of meeting. In the case of a special meeting the purpose of the meeting must be included in the notice.

2.6 VOTING. Voting rights will be determined by the Secretary based on the Corporation's Share Transfer books. Each share is entitled to one vote regardless of the class. Votes may be cast in person or by proxy executed in writing.

2.7 QUORUM. A majority of the qualified voting shareholders, in person or by proxy, will constitute a quorum. A quorum is required for actions taken to be considered Shareholder approved.

Article 3---Board of Director Meeting

3.1 MEETING LOCATION. Meetings shall be held at the Corporation's principal place of business or at an alternate location chosen by the Board.

3.2 REGULAR MEETINGS. Regular Meetings shall be held at a date and time that is acceptable to the Board members and at a frequency that promotes the growth of the Corporation.

- 3.3 SPECIAL MEETINGS. Special meetings may be called at any time by president of the Board of Directors. Notice of the meeting must be received by each Director at least 3 days before the meeting. The notice must include the agenda for the meeting along with the place and time of the meeting.
- 3.4 TELEPHONE MEETINGS. When necessary or desired, the Board may elect to meet via conference call or any other means where all participants can hear each other. Decisions made at such meetings will have the same authority and power as a decision made at meetings where the participants were physically present.
- 3.5 ACTION WITHOUT A MEETING. Any action that may be taken at a regular or special meeting of the Board may be taken without a meeting if all members of the Board, in writing, consent to the action. All such actions will have the same authority and power as actions passed at meetings where the participants were physically present.
- 3.6 QUORUM. A majority of the authorized Directors will constitute a quorum. A quorum is required for actions taken to be considered Board approved.

Article 4---Directors

- 4.1 AUTHORITY. The business and affairs of the Corporation shall be managed by a Board of Directors subject to any limitations in the Articles of Incorporation.
- 4.2 ELECTION. The members of the Board of Directors will be elected by the voting members at the annual meeting. The Director will serve for the time specified at his or her election but for no less than one year.
- 4.3 NUMBER OF DIRECTORS. The number of authorized directors will be determined by the Board. This number may be increased or decreased as needed by a vote of the Board. No decrease in the number of Directors may shorten the term of an incumbent Director.
- 4.4 RESIGNATION. At any time, a Director may resign by giving a letter of resignation to the Secretary of the Corporation. The resignation will become effective immediately or at the date specified without a vote of

the Board. A vote of a quorum of Directors or Shareholder will be required to remove a Director for cause.

4.5 VACANCIES. Vacancies on the Board will be filled by a vote of the Board. A majority vote of the current Directors will be required for election. Board elected directors will serve until the next Shareholder's annual meeting when a Board of Directors election will be held.

4.6 COMPENSATION. Directors will serve on a voluntary basis and will not receive compensation for their services except for expenses incurred and specified by Board resolutions. A Director may be compensated for services provided to the Corporation if he also serves in another position such as an officer, agent, or employee.

Article 5---Officers

5.1 NUMBER OF OFFICERS. The Corporation shall have at least a President and a Secretary. Other officers, along with titles and responsibilities, may be added by the Board of Directors. One person may be selected to serve in more than one position.

5.2 ELECTION. Officers' election, length of term, and compensation is set by the Board.

5.3 REMOVAL AND RESIGNATION. An officer may be removed or resign at any time, with or without cause. Removal requires an action of the Board. Resignation requires that the officer submit a written notice of his resignation to the Secretary.

5.4 PRESIDENT. The President will serve, at the discretion and under the supervision of the Board, as the general manager and chief executive officer of the corporation. The President will have the authority and power to run the day-to-day operations of the company under the guidelines provided by the Board. In the absence of a Treasurer, the President will also serve as the chief financial officer.

5.5 SECRETARY. The Secretary will be responsible for: (1) sending out notices for all meetings, (2) keeping minutes for all meetings, (3) maintaining the Corporate Record Book, (4) maintaining Corporation records and seal.

5.6 COMPENSATION. The Board of Directors will set the compensation for officers. No officer will be denied compensation due to the fact that they are also a shareholder, Director, or both.

Article 6---Authority to Execute

6.1 BINDING POWER. No shareholder, officer, agent, or any other person or company has the right or power to bind the Corporation by pledge, agreement, contract, or any other means without the expressed written permission of the Board of Directors.

6.2 SIGNATORIES. With authorization from the Board of Directors, the President and Secretary will sign all documents, including all financial documents that require the signature or endorsement of a corporate officer.

Article 7---Shares

7.1 CLASSES. The Corporation may issue one or more classes of shares. Each share in each class will have the same value, voting rights, and restrictions as any other share in the class.

7.2 CERTIFICATES. Certificates for shares will be issued only after the full value of the share has been paid to the Corporation. Acceptable forms of payment include donated property, work rendered, and money paid. Certificates will be signed by the Secretary or other officer as designated by the Board.

7.3 TRANSFER OF SHARES. Shares may be transferred when endorsed, written documentation from the shareholder is presented to the Secretary. The Secretary will issue a new certificate bearing the name of the new shareholder, cancel the old certificate, and record the transaction in the Corporate Record Book.

Article 8---Corporate Records

8.1 CORPORATE MINUTES. A record of all meetings of shareholders and directors will be kept at the principal place of business or at an alternate location chosen by the Board of Directors. The minutes shall include the

date, time, location, names of attendees, purpose, and acts of each meeting.

8.2 SHARE RECORDS. Share information will be kept at the principal place of business or at an alternate location chosen by the Board of Directors. The information to be kept includes the shareholder name and address, class and number of shares, date issued, date transferred, date cancelled, and certificate numbers.

8.3 FINANCIAL RECORDS. The chief financial officer will be responsible for maintaining accurate records of all corporate financial transactions. Industry acceptable accounting procedures are to be followed so that the records may be used in the preparation of the Corporation's tax returns.

8.4 INSPECTION OF RECORDS. Corporate records and Bylaws are available for inspection by Directors and Shareholders. Before examination, the inspecting party must sign an affidavit stating that the information will be kept confidential.

8.5 FISCAL YEAR. The Board of Directors will determine the fiscal year of the Corporation based on the prevailing guidelines of the Internal Revenue Service.

Article 9---Indemnification and Insurance

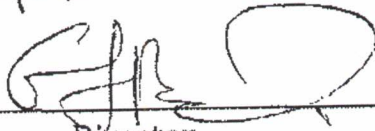
9.1 INDEMNIFICATION. The directors and officers will be indemnified to the fullest extent of the law by the Corporation. Any director or officer that is found to be negligent or guilty of misconduct will forfeit their indemnification.

9.2 INSURANCE. The Corporation shall have the power to purchase and maintain insurance for any agent of the Corporation including but not limited to directors, officers, and employees.

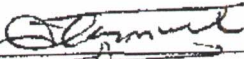
Article 10---Adoption

This is to certify that the foregoing is a true and correct copy of the Initial Bylaws duly adopted by undersigned Board of Directors.

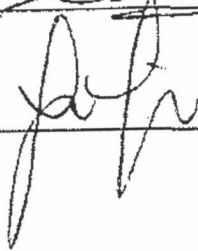
Date: 10/11/17, 2017



Director



Director



Director

Seal



Secretary

Corporate Banking Resolution
For
4bros Inc

Whereas, a meeting of the Directors of 4bros Inc was held in accordance with the guidelines set forth in the 4bros Inc Bylaws. The following resolutions were adopted:

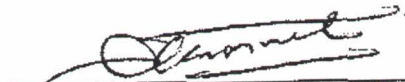
Resolved, that it is in the best interest of 4bros Inc to open a business checking account.

Resolved further, that the President of 4bros Inc is authorized to establish a business checking account for 4bros Inc to be used for business purposes.

Resolved further, that the President of 4bros Inc is authorized to be the signatory on the business checking account.

Resolved further, that this resolution will become effective immediately.

In Witness Whereof on this 19 day of October, 2017 the undersigned, Secretary of 4bros Inc, certifies that the foregoing resolutions were submitted, adopted, and are in full force in accordance with the 4bros Inc Bylaws.




Secretary Signature

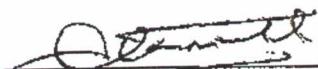
**Waiver of Notice for Initial Board of Director Meeting
of
4bros Inc**

We, the undersigned Directors, declare and confirm that we consented to the initial meeting of the Board of Directors on October 19th, 2017 at 7 Sixth St Haversville and hereby waive notice.

Signed this 19 day of October, 2017




Director Signature



Director Signature

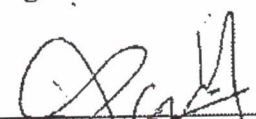
Corporate Seal



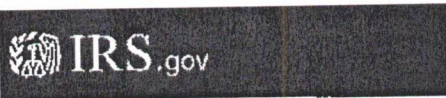
Director Signature



Director Signature



Director Signature



EIN Assistant

Your Progress:

1. Identity

2. Authenticate

3. Addressed

4. Details

5. EIN Confirmation

Congratulations! The EIN has been successfully assigned.

EIN Assigned: 82-2287373

Legal Name: 4BROS INC

The confirmation letter will be mailed to the applicant. This letter will be the applicant's official IRS notice and will contain important information regarding the EIN. Allow up to 4 weeks for the letter to arrive by mail.

We strongly recommend you print this page for your records.

Click "Continue" to get additional information about using the new EIN.

[Continue >>](#)

Help Topics

- Can the EIN be used before the confirmation letter is received?



William Francis Galvin
Secretary of the
Commonwealth

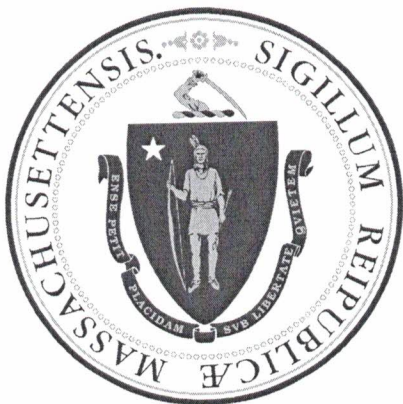
The Commonwealth of Massachusetts
Secretary of the Commonwealth
State House, Boston, Massachusetts 02133

Date: December 22, 2017

To Whom It May Concern :

I hereby certify that according to the records of this office,
4BROS INC

is a domestic corporation organized on **July 24, 2017** , 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.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 17120484650

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

Processed by:



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

William Francis Galvin
Secretary of the
Commonwealth

Date: November 30, 2017

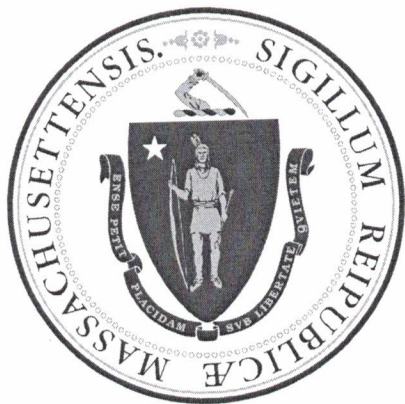
To Whom It May Concern :

I hereby certify that,

4BROS INC

appears by the records of this office to have been incorporated under the General Laws of this
Commonwealth on **July 24, 2017**.

I also certify that so far as appears of record here, said corporation still has legal existence.



In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

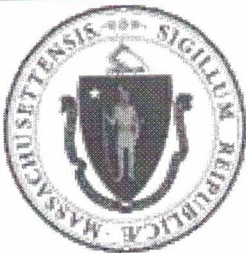
William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 17110537810

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

Processed by:



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001283676

ARTICLE I

The exact name of the corporation is:

4BROS INC

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

CULTIVATION

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.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding <i>Num of Shares</i>
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CWP	\$0.00100	10,000	\$10.00	10,000

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

ARTICLE VI

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

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

ARTICLE VII

The effective date of organization 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.

Later Effective Date: Time:

ARTICLE VIII

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

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Name: LEGALCORP SOLUTIONS, INC
No. and Street: 1900 WEST PARK DRIVE, SUITE 280C
City or Town: WESTBOROUGH State: MA Zip: 01581 Country: USA

c. The names and street 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):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	GUNVANT KUMAR PATEL	30 BUCKLEY BLVD CHICOPEE, MA 01020 USA
TREASURER	GUNVANT KUMAR PATEL	30 BUCKLEY BLVD CHICOPEE, MA 01020 USA
SECRETARY	GUNVANT KUMAR PATEL	30 BUCKLEY BLVD CHICOPEE, MA 01020 USA
DIRECTOR	GUNVANT KUMAR PATEL	30 BUCKLEY BLVD CHICOPEE, MA 01020 USA

d. The fiscal year end (i.e., tax year) of the corporation:
December

e. A brief description of the type of business in which the corporation intends to engage:

CULTIVATION

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

No. and Street: 30 BUCKLEY BLVD
City or Town: CHICOPEE State: MA Zip: 01020 Country: USA

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):

No. and Street:

30 BUCKLEY BLVD

City or Town:

CHICOPEE

State: MA

Zip: 01020

Country: USA

which is

☒ its principal office

☐ an office of its transfer agent

☐ an office of its secretary/assistant secretary

☐ its registered office

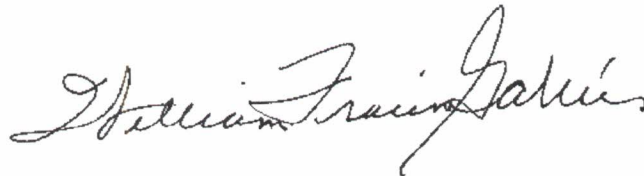
Signed this 24 Day of July, 2017 at 6:00:56 PM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

SONIA BECERRA

THE COMMONWEALTH OF MASSACHUSETTS

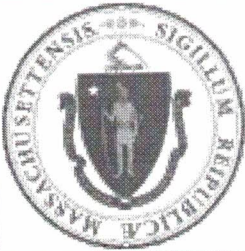
I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with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

July 24, 2017 05:59 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



The Commonwealth of Massachusetts William Francis Galvin

No Fee

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

Statement of Change of Supplemental Information

(General Laws, Chapter 156D, Section 2.02 AND Section 8.45; 950 CMR 113.17)

1. Exact name of the corporation: 4BROS INC

2. Current registered office address:

Name: LEGALCORP SOLUTIONS, INC
No. and Street: 1900 WEST PARK DRIVE, SUITE 280C
City or Town: WESTBOROUGH State: MA Zip: 01581 Country: USA

3. The following supplemental information has changed:

Names and street addresses of the directors, president, treasurer, secretary

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	JORGE ENRRIQUE TIRSE	53 PARK STREET GLOVERSVILLE, NY 12078 USA
TREASURER	VIPUL PATEL	9223 SHELLY DRIVE MARCY, NY 13403 USA
SECRETARY	HASMUKHKUMAR PATEL	4516 BROOKS BLVD MARCY, NY 13403 USA
CEO	GUNVANT KUMAR PATEL	7 6TH STREET GLOVERSVILLE, NY 12078 USA
CFO	VIPUL PATEL	9223 SHELLY DRIVE MARCY, NY 13403 USA
CO-PRESIDENT	HASMUKHKUMAR PATEL	4516 BROOKS BLVD MARCY, NY 13403 USA
VICE PRESIDENT	RAJU K JOSHI	205 RAY ST SOUTH ILION, NY 13357 USA
DIRECTOR	JORGE ENRRIQUE TIRSE	53 PARK STREET GLOVERSVILLE, NY 12078 USA

Fiscal year end:
December

Type of business in which the corporation intends to engage:

CULTIVATION, REGISTERED MEDICAL DISPENSARY

Principal office address:

No. and Street: 7 6TH STREET
City or Town: GLOVERSVILLE State: NY Zip: 12078 Country: USA

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (*post office boxes are not acceptable*):

No. and Street: 630 BEAULIEU ST
City or Town: HOLYOKE State: MA Zip: 01040 Country: USA

which is

 its principal office
 an office of its secretary/assistant secretary
 an office of its transfer agent
 X its registered office

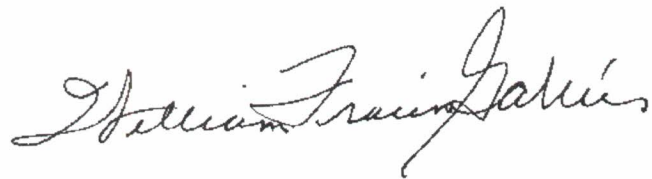
Signed by JORGE TIRSE, its PRESIDENT
on this 25 Day of October, 2017

THE COMMONWEALTH OF MASSACHUSETTS

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

deemed to have been filed with me on:

October 25, 2017 08:56 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



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

mass.gov/dor

Letter ID: L1190968192
Notice Date: June 13, 2019
Case ID: 0-000-547-853



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



4BROS INC
7 6TH ST
GLOVERSVILLE NY 12078-4216

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, 4BROS INC 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: May 22, 2020

To Whom It May Concern :

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

4BROS INC

is a domestic corporation organized on **July 24, 2017** , 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 that reads "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 20050412010

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

Processed by: tad

loyalty from current customers who see the Company participating in local events, functions, and community-building activities.

Networking: As with any relationship-based business, the Company will benefit from participating in several networking opportunities that have the potential to yield new contacts as well as nourish existing ones.

Promotions: The Company will enhance its exposure among members of the public and incentivize customers by providing a range of promotional opportunities. This may include periodic, limited-time specials to drive consumer traffic during slow periods, referral rewards programs for customers who refer new clients, and a loyalty program to encourage repeat patronage.

MANAGEMENT SUMMARY

4Bros was formed by Gunvant Patel and Jorge Tirse to cultivate, process and sell medical and recreational marijuana in the state of Massachusetts.

Gunvant Patel, CEO and Leader of Management Team

Mr. Patel has more than 20 years of experience as a business owner and in senior management. His qualifications are expected to enable the Company to produce the highest quality cannabis products in a cost-effective manner. With his natural ability to determine strong points in a business and adjust resources to meet the Company's financial and corporate goals makes his combined qualifications a recipe for success. Mr. Patel has been intimately involved with establishing programs through his businesses that focus on the need of the clients and public. His hands-on approach to his business ventures keeps him in control of the strength of the company.

Jorge Tirse, COO, Partner and Cultivation Expert

Jorge has been in real estate since 2007 and has worked with Mr. Patel, CEO, on multiple projects. Jorge managed and operated restaurants and bars from 2005 to 2011. He has also been a supervisor for Espuna, a dry-cured sausage facility from Spain, from the period of 2015-2017. During this time Mr. Tirse worked closely with the USDA in monitoring and correcting humidity and moisture as well as temperature and PH of the product and drying room. He has completed his certificate in "*Development of HACCP*" from NC State University. "**HACCP** was **developed** in the late 1950s by a team of food scientists and engineers from The Pillsbury Company, the Natick Research Laboratories, and the National Aeronautics and Space Administration. The team **developed** a system designed to build quality into the product to ensure food safety for the manned space program". Jorge maintained all data entries in a (SAP) *System applications programs* to record, maintain and stay compliance with USDA and HACCP plans. Jorge also performed lab testing AV water activity, PH, collected swabs and calibration of all instruments. He has maintained production planning and managing task, to achieve record breaking goals. Jorge worked at the Lexington Rehabilitation Center NYSARC from 2005 to 2008. While working for NYSARC, he was med certified, HIPPA certified, and earned an advanced behavioral support certification along with completing Dietary Nutrition's. Jorge has taken courses and has been certified in both Colorado and Washington states Safety and Regulation, Cannabis Products, Cannabis business, Trichomes Tender, Horticulture Specialist, Marijuana 101, and Grow basics. Jorge is very goal driven, and passionate about everything aspect of his work.

Raju Joshi, Vice President and Partner

Raju is CEO and Vice President to multiple Corporations throughout Massachusetts. Just to name a few of the corporations he has been affiliated with include: OUM RAM Corp, Sohum & Shivam Corp, Aksar Corp, TK Boston, LLC and Shiv Krupa, LLC. With Raju's directness and business intelligence he brings to the table, 4Bros, Inc will be a force to be reckoned with. He currently owns and manages gas stations and real estate properties as well as a sport pub/restaurant by the name of "Tilted Kilt" in Massachusetts. His vast experience, in a variety of businesses, has proven to be an asset to the company. Mr. Joshi has already demonstrated his ability in guiding the management team to run a successful business. His entrepreneurship skills and leadership skills will bring innovative ideas to cut cost and make contributions to the success of the company. His expertise in following local, state and federal laws, in managing these businesses, will help the company's operations run successfully. His experience as manager and owner of multiple businesses gives him the

advantage in carrying out such functions as hiring employees, payroll, inventory management, maintain record keeping, solving day to day issues, environmental and contamination issues of properties, financial stability, deal with local as well as state authorities to comply with the rules and regulations set forth by the DPH and CCC (Department of Health and Cannabis Control Commission).

Hasmukh Kumar Patel, CO-COO and Secretary

Hasmukh Kumar is a career Pharmacist, he holds a degree of Bachelor of Pharmacy and a Master of Pharmacy in Pharmaceutics. While Mr. Patel was studying his degree in pharmacy, he also studied for his master's degree in the subjects of Chemistry, Pharmacognosy, Organic Chemistry, Analytical, Pharmaceutics, Pharmacology, Micro-biology and more. With his vast range of knowledge, he will be enabled to use his knowledge in the field of tablet, capsule, emulsion, solutions, suspensions, packaging, and labeling. Hasmukh is well experienced in the implementation of all Federal, state and local laws/policies and procedure to ensure and maintain compliance. Hasmukh has over 15 years of experience in pharmacy, and currently has two pharmacy locations which shows his wisdom as an owner, manager and financial administrator. Hasmukh experience includes data entries of patients, online billing to insurance companies, printing prescription labels and dispensing/handling drugs, including control substances and narcotics as per Federal/DEA guidelines. Hasmukh keeps records and inventory through pharmacy software and hard copies per DEA, federal and state laws. Hasmukh is also experienced in compounding prescriptions which are not commercially available to dispense by mixing appropriate active and non-active ingredients. He is HIPPA certified and counsel's patients based on prescriptions acquired. Hasmukh is known for his expertise and professional guidance in the pharmaceutical industry. Mr. Patel's financial capabilities, experience in handling narcotic substances, and wisdom in the pharmaceutical field, brings many strengths to the company. With his training making employees understand and follow all the laws and meet the training requirement in highly regulated business by local, state, and federal authorities brings added talent for the company to run the business effectively and efficiently.

Vipul Patel, CFO-Treasurer

Vipul followed his path from a small register clerk/cashier position, manager and then finally to an owner of his own Gas Station business. He has vast experience in managing multiple gas station businesses. His expertise of hiring the right employees, inventory management, loss & prevention, following state and federal laws, work ethics, payroll management, following environment guidelines set by the state, record keeping and much more. His expertise in money management and negotiations help minimize the financial burden on the company. As a treasurer he will be fully in charge of all financial transactions in helping to cost cut and maintain

fiscal discipline. His financial capability and supervising ability of running a successful business, will help the company prosper.

FINANCIAL PROJECTION

The below tables reflect the square footage of a proposed cultivation facility. The cultivation facility not only includes the cultivation area but also the required kitchen and extraction areas of the building. For the medical marijuana program, a grow and dispensary must be vertically integrated. Dispensaries are only allowed to purchase 30% of their inventory from other vendors. This rule has been set by the Department of Public Health in Massachusetts who is the governing body that controls the medical marijuana program.

Cultivation Facility Square Footage

28,000

Cultivation Area	SQ FT Breakdown
Clone/Veg/Mother Rooms	6,000
Flower Rooms (double stack/walkways/feeding room)	16,000
Dry rooms/packaging/harvest room	3,000
Kitchen Area	
Extraction/Cold Storage/Kitchen	3,000

Cultivation

Tables	lbs. Per Table	lbs. Per Cycle	Cycles Per Year	lbs. Per Year	Price Per Unit	Total Revenue
400	3	1,200	5.5	6,600	2,000	13.2 million

Extraction

Trim	Oil	Return	Cost	Revenue
6000 lbs.	600 lbs.	10%	7,000	4.2 million

Total Oil and Flower Revenue

\$17.4 million

Operational cost usually run approximately at 20% and the facility should be running at full production by the end of the second year.

Please note these are not exact numbers but estimates. Depending on circumstances number can fluctuate up or down.

Depending on money raised "The Facility" can be built out in stages. The following figures again are estimates, and a more accurate number can be provided once the engineers and architects have begun the design stage.

Facility Construction Cost

Electrical and material
Drainage
Engineering
Hvac units and installation
UV lighting
City permits
Security hardware and installation
Plumbing showers/ wash stations
Total building materials Construction
Drywall
Framing
Painting
Doors
Doors hardware
Common area lighting
Secure all windows

Facility Equipment Development Cost

400 flower tables	Kitchen
135 veg tables	Co2
1600 600 wats HPS lights	Co2 lab and machine
300 CMH veg lights/mothers	Dry rooms
10 light controllers	30 Cloners
27 air pumps	Clone racking
Racking	Mother room feed irrigation
Fans	Packaging room
Blowers	Internet
Carbon filters	Tracking hardware and system
Piping for tables	Decontamination Mats and supplies
6 Dehumidifiers	Trimming machine
Grommets	De-leafing machine
Air valves for table	De-budding machine
Trellis	15 Stainless steel working benches
Harvest tools /glasses	Office furniture
1 air shower	Staff Lockers
2 large vac ovens for extraction	Lunch area (sink, fridge, tables)
12500 pots	Commercial washer and dryer
Nutrient	
Medium	
Spaghetti lines/pumps/ tanks	
Feeding injector system	

Cultivation Facility estimated cost of complete buildout: \$5,500,000.00

Dispensary Facility Square Footage 2,000

Dispensary Facility Square Footage

Lobby
Sales Floor
Educational Center
Safe Room
Intake Room
Office
Bathroom
Kitchen (Breakroom)

Dispensary Equipment Development

Furnishings Display Cabinets/chairs/tables etc.
Vaults

Computers (3) Printers (2)

Scales (2)

Label Machine and Labels

Tracking software Hardwired

ATM Hardwired

Monitors (for digital menus)

Flat Screen Tv for Educational Center

Learning materials, digital and hard copies

Phone System

Internet Services

Office Supplies

Exit Bags, storage jars for cannabis, display jars

Dispensary Construction

Electrical and materials

Plumbing

Communications (Internet/Phone)

City permits

Demolition

Dry wall and framing	
Ceilings	
Lighting	
Flooring	
Painting	
Drywall	
Doors	
Door hardware	
Security System Hardwired	

Dispensary estimated cost of complete buildout:

\$500,000.00

Personal Forecast

Staff Count Per Position – Dispensary and Cultivation Facility

	Year 1	Year 2	Year 3
President CEO	1	1	1
Controller COO	1	1	1
HR Manager	1	1	1
Accountant	1	1	1
Manager Pharmacist	1	1	1
Security Manager	1	1	1
Security Personnel	1	2	3
Cultivation Expert	1	1	1
Cultivation Personnel	6	12	16
Customer Service	2	3	4
Total Personnel	16	24	30

Staff Count Salary by Position – *Dispensary and Cultivation Facility*

	Year 1	Year 2	Year 3
President CEO	\$175,000	\$183,750	\$192,937
Controller COO	\$125,000	\$131,250	\$137,812
HR Manager	\$63,000	\$60,000	\$66,150

Accountant		\$30,000	\$33,075
	\$31,500		
Manager Pharmacist		\$75,000	\$82,687
	\$78,750		
Security Manager		\$75,000	\$82,687
	\$78,750		
Security Personnel	\$38,400	\$76,800	\$115,200
Cultivation Expert		\$120,000	\$132,300
	\$126,000		
Cultivation Personnel	\$129,600	\$259,200	\$345,600
Customer Service		\$57,600	\$107,784
	\$82,080		
Total Wages	\$885,600	\$1,111,080	\$1,296,232

As revenue allows, all hourly employee's wages are based on a 30-hour work week at \$15.00 per hour. The 2nd and 3rd year projections reflect a 5% increase across the board for salaried employees and as per each individual basis, a raise may be considered for hourly employees.

Staff is subject to company needs and employment may increase or decrease.

4BROS, INC

B u s i n e s s P l a n

Contact: Jorge Tirse

Phone: 518-224-4772

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EXECUTIVE SUMMARY

A recent report by Arcview Market Research found that regulated cannabis sales in North America totaled \$6.9 billion in 2016, with sales projected to increase to about \$21.6 billion by 2021. Massachusetts joined the ever-growing market, as medical marijuana became legal in Massachusetts in 2012. Recreational marijuana became legal in Massachusetts as of December 15, 2016 and is on track to open dispensaries and cultivation facilities for recreational purposes in mid to late 2018.

4Bros, Inc (also referred to as “4Bros” and “the Company”) and its highly qualified leadership team is proud to join this industry as a medical marijuana producer, processor and dispensary, later to move into the recreational market. The Company’s business model intends to vertically integrate the Company into all aspects of Massachusetts’s new system. With a proposed cultivation, processing and dispensary operation in the most populated region of the western part of the state. The Company will be able to streamline its process, maintaining quality control at each step and increasing revenue through its retail ventures. 4Bros will provide a wide range of products to medical and recreational cannabis patients and clients based on patient needs and requests. 4Bros range of products will encompass those from whole-plant based products to more highly purified forms of the cannabinoids.

To maintain regulations and quality control along with saturation, Massachusetts has limited the number of cultivators, processors, and dispensaries in each area. 4Bros dispensary will be located in the western most region of the state, which encompasses over half of the population of western Massachusetts. 4Bros, Inc, will be located in Hampden county which has a population of 470,690 as of 2015 and is one of the three counties in western Massachusetts. The counties are Hampden, the most populated, Hampshire and Franklin. Springfield, Massachusetts is in Hampden county and has an estimated population of over 154,277 as of 2015. The US Office of Management and Budget defines the Springfield, Massachusetts metropolitan statistical area as consisting of three counties in Western Massachusetts. As of July 1, 2009, the metropolitan area’s population was estimated at 631,982, only up a few percentage for a population in 2015 to 702,583. With a new business that will provide employment to the community, those numbers are expected to increase. With Hartford, Connecticut being only 23.9 miles from Springfield and the proposed facility only 8.2 miles from Springfield, it will be an easy commute for workers and clientele. Hartford, Connecticut has a population of 123,243 as of 2016 and the greater metro area as defined by the US Census Bureau has an estimated population of 1,212,381 million, (which includes surrounding boroughs, cities and three counties), as of 2010 with a median age of 40.6. A combination of Massachusetts and Connecticut gives 4Bros, Inc. a considerable advantage over other cannabis ventures with its vast populations.

The Company will operate at the conjunction of the estimated \$3.5 billion *Medical & Recreational Marijuana Growing* industry and the estimated \$6.7 billion *Medical &*

Recreational Marijuana Stores industry. The combination of the two consider both aspects of the Company's vertical integration of the market.

In regard to its own dispensary, 4Bros will develop a brand that communicates its core values of providing a comfortable dispensary setting in which customers in Massachusetts can purchase medical marijuana products and later recreational marijuana products. In this business-to-consumer aspect of its business model, the Company plans to utilize a direct marketing approach leveraging digital tactics such as social networking with traditional word of mouth in a strategy specifically designed to reach new medical marijuana clients. The Company will additionally work with medical doctors for patient referrals.

To achieve the Company's objectives, 4Bros, Inc. has set a budget of \$6 to \$7 million and is fully self-funded.

Use of Funds

4Bros, Inc is fully self-funded.

Company Ownership

Gunvant Kumar Patel, CEO

Raju K Joshi, Vice President

Vipul Patel, CFO-Treasurer

Hasmukh Kumar Patel, CO-President/Secretary

Jorge Enrique Tirse, President/Director

Company Location

4Bros, Inc. is registered in the state of Massachusetts.

The facilities location will be at:

630 Beaulieu Street

Holyoke, Massachusetts 01040

4BROS : AN OVERVIEW

After the legalization of marijuana products in the state of Massachusetts in 2016, the State jumped into organizing the program in the most efficient and beneficial way possible. To facilitate the program, Massachusetts has offered medical marijuana dispensary owners the chance to apply first for the transition over to recreational dispensaries. The state believes that allowing the medical dispensaries business owners to apply first for the recreational license, this will provide the state with a more informed and experienced group of business owners, to serve the public. This design will give Massachusetts the advantage in maintaining excellent quality control to ensure the best products and most knowledgeable employees will be available to assist medical card holders and later recreational clients, for the cannabis market place.

Per the Department of Public Health, known as the DPH and acting body for medical marijuana in Massachusetts projects full implementation of the medical marijuana program to take between 18 – 24 months as growers and distributors are authorized, crops are grown, and applicable patients are given medical cards.

4Bros, Inc. intends to vertically integrate the Company into all aspects of Massachusetts's new system. The company proposes to have a cultivation, production and dispensary operation in Hampden county which is in the western region of the state and will be able to create a fully self-sustaining business.

The Company has forged a group of nationally recognized cannabis experts with established brands, along with advanced production and quality control capabilities utilizing high-tech production and management methods. The combination of expert cannabis growth, processing, modern quality control, and advanced production methods allows 4Bros to provide extremely high quality and cost competitive medicines to Massachusetts cannabis patients and clients.

Medical and Adult-use Marijuana Grow Operations

The Company's cultivation rooms will be constructed as clean rooms with positive pressure and anterooms for entry. The anteroom will be equipped with protective clothing for employees to control the entry of pests and contamination. Production methods for growth will include both hydroponic (utilizing mineral-nutrient solutions in a water solvent rather than soil) and traditional soil growth methods. The ability to perform both soil and hydroponic growth methods allows for the optimization of growth method to meet desired extract characteristics

and cost goals. Each room will be either soil or hydroponic. In soil rooms, soil steam sterilization methods will be used prior to planting.

Environmental control of the growth rooms will be done using “direct digital controllers” for temperature, humidity, CO₂, and light controls. Nutrient and soil sensors will be used to control the growth medium and nutrient quality. Soil moisture sensors will be utilized along with automated moisture systems to optimize watering and nutrient deployment. Trained employees will be used to identify growth problems with plants, along with testing equipment to detect nutrient excesses or deficiencies. Video and photo monitoring of plant growth will be used to measure growth rates on a regular basis and synched with room environmental data for analysis.

Statistical Quality Control (SQC) methods have been used in modern agriculture production for many years and will be utilized at 4Bros. The use of statistical methods to monitor plant growth and processing methods will help to ensure consistent quality and reduce costs. Control charting will be used to identify when a critical process is starting to deviate from the normal process at an early stage, prior to it becoming major problem.

Dispensary Products

4Bros will provide a wide range of products to medical cannabis patients and later, recreational patients, based on patient needs and requests. 4Bros range of products will encompass those from whole-plant based products to more highly purified forms of the cannabinoids. Whole-plant based products will be formulated to be closer to the processed natural plant. The more highly purified or refined forms of the cannabinoids will have higher concentrations (~80%-90%). The Company believes this range of products can address the entire range of patient product needs allowed by Massachusetts. Additionally, the Company plans to develop new branded products for Massachusetts based on evolving patient needs and requests. These may include new cannabis strains and product formulations directed at patient needs.

The cannabis medications 4Bros will provide include cannabis in capsule form, oil, topical gels, creams, ointments, vaporization, nebulization and tinctures in various concentrations as well as the cannabis flower for smoking. This range of products will allow the Company to provide necessary medications to all patients. As the system evolves, 4Bros will ask for customer feedback and adjust its product offerings to meet customer needs and preferences.

MARKET ANALYSIS SUMMARY

A recent report by Arcview Market Research found that regulated cannabis sales in North America totaled \$6.9 billion in 2016. Sales are projected to increase to about \$21.6 billion by 2021.¹ More states put marijuana legislation, either medical-only or recreational, on ballots each cycle as the topic grows in popularity. Massachusetts legalization in 2016 is the latest in this trend and comes with many regulations as the state's government attempts to stay on top of the demand and distribution of the drug. 4Bros dispensary will be located in the most western region of the state, encompassing all three counties (Hampden, Hampshire and Franklin) in the western region of the state. The following table provides the most current U.S. Census data with regard to the population change of these counties.

	Hampden	Hampshire	Franklin
Population estimates, 2009	471,081	156,044	71,778
Population estimates 2009 - 2015	470,690	161,292	70,601

As stated earlier, Hartford, Connecticut is only 23.9 miles from Springfield, Massachusetts which is the largest city in western Massachusetts. The proposed facility is 8.2 miles from Springfield, it will be an easy commute for workers and clientele. Hartford, Connecticut has a population of 123,243 as of 2016 and the greater metropolitan area as defined by the US Census Bureau has an estimated population of 1,212,381 million as of 2010 with a median age of 40.6. A combination of Massachusetts and Connecticut gives 4Bros, Inc. a considerable advantage over other cannabis ventures with its vast populations.

Market Segmentation

4Bros will simultaneously target both consumers and dispensers in Massachusetts. With its own dispensary, 4Bros will be able to market to the medical card carriers and recreational clients in the western region and bring its top-quality products straight from production to retail sale.

¹ Alicia Victoria Lozano. Medical Marijuana... February 2017. Source: <http://tinyurl.com/zk5e7nx>

Patients or caregivers of those diagnosed with one or more of 14 diseases and conditions can apply for medical marijuana card (other ailments can be considered as well depending on the patient's doctor).

Research done by the Marijuana Policy Group (MPG) extrapolates the percentages of the 14 illnesses and other ailments that may be consider and approved by Massachusetts to receive medical cards to population estimates, resulting in the following table:

Condition	# of Patients (Lower Bound Estimate)	# of Patients (Point Estimate)	# of Patients (Upper Bound Estimate)
ALS	23	27	30
Cancer	2,676	2,494	2,676
Chronic Pain	126,517	130,338	134,584
Crohns Disease	629	590	635
Glaucoma	975	954	975
HIV/AIDS	4,951	6,094	7,237
Hepatitis C	1,114	1,032	1,212
Multiple Sclerosis	211	235	288
Parkinson's Disease	<u>3,463</u>	<u>3,356</u>	<u>3,804</u>
Total Patients	140,560	145,120	151,440

According to this data, MPG created a range of patients likely to register as medical marijuana users, taking into account comorbidity (a single patient falling into more than one qualifying condition's category) and adjusting for the lack of smoke-able and edible products.

The Company also intends to market its products to other dispensaries throughout Massachusetts.

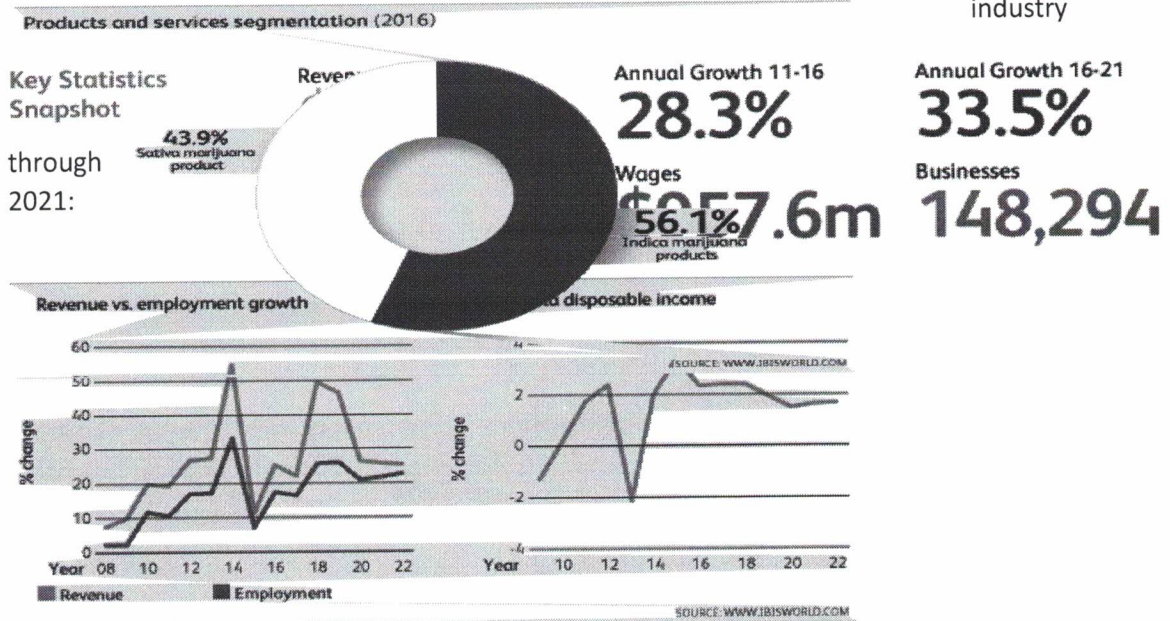
Industry Analysis

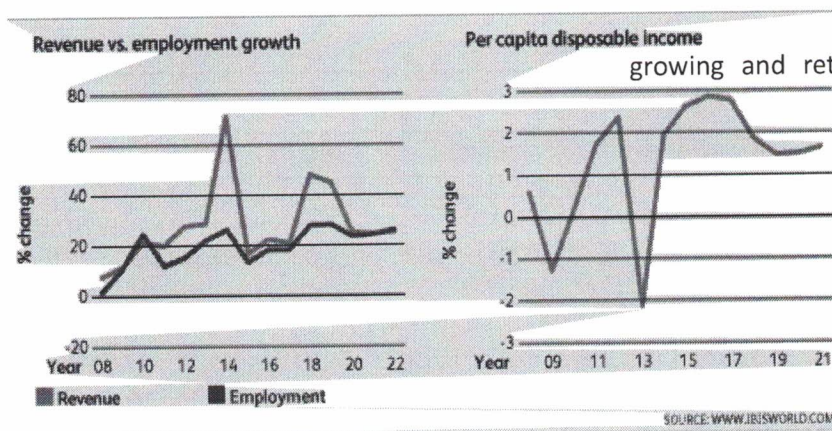
Massachusetts will operate at the conjunction of the \$3.5 billion *Medical & Recreational Marijuana Growing* industry and the \$6.7 billion *Medical & Recreational Marijuana Stores* industry. The combination of the two takes into account both aspects of the Company's vertical integration of the market.

The *cultivation* industry has grown quickly over the last five years, thanks to the many states that have legalized either medical or recreational use and the growing acceptance of the plant's uses. In 2014, after Washington and Colorado's legalization, the licensing of commercial recreational marijuana growers in those states heavily contributed to the 54.7% growth of the industry. Additionally, the country's steadily aging population benefits as more uses are found for the plant.

In the next five years, the industry is projected to grow at an even faster rate than previously. The industry remains at a certain level of risk until the federal government changes its stance, but until then medical marijuana users and recreational proponents will keep driving the industry to new heights.

The following graphics, provided by IBISWorld, illustrate the projected growth of the *Growing* industry





Both the growing and retail industries surrounding marijuana have similar drivers and often rely on the trends to predict business. The *Medical & Recreational Marijuana Stores* industry is also benefiting from the upswing in marijuana's

popularity, both for medical and recreational purposes. As more states legalize, the industry experiences a boost in revenue and operators. In Washington and Colorado, the legalization of the plant and opening of the first stores led to a 70.5% growth in revenue. In the next five years, the industry will continue to grow at a strong rate as more states choose to legalize marijuana in the face of rising demand. Increased demand and higher disposable income will widen profit margins for industry operators.

The following graphics project the growth of the *Medical & Recreational Marijuana Stores* industry through 2021:

Key Statistics
Snapshot

Revenue

\$6.7bn

Annual Growth 11-16

32.1%

Annual Growth 16-21

32.3%

Profit

\$266.3m

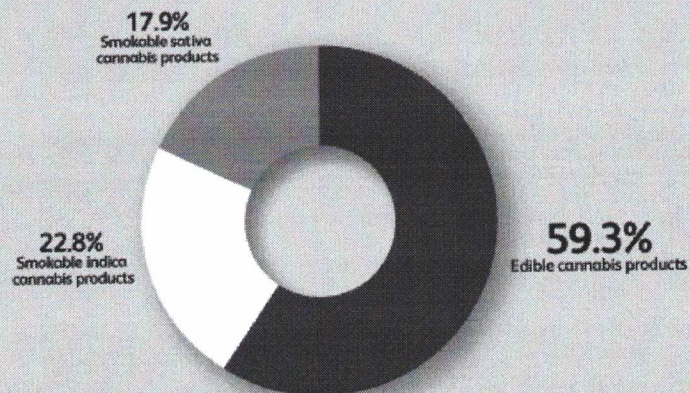
Wages

\$1.5bn

Businesses

5,796

Products and services segmentation (2016)



SOURCE: WWW.IBISWORLD.COM

Competitors

4Bros will operate within the Massachusetts government's system for controlling medical and recreational marijuana, guaranteeing service to medical card holders and clients, and raising the bar for products so only the finest cultivators and processors are selected to support the patients.

4Bros dispensary, cultivation and processing operations will operate in the western metro most regions. As per the Medical Marijuana Commission, each applicant can open no more than three separate locations to keep saturation and monopolization at a minimum.

As a dispensary, 4Bros will compete against the other approved dispensaries in the same region, as well as other dispensaries in other areas of the state of Massachusetts. By spreading out the number of dispensaries in each region, Massachusetts is not only limiting market saturation but also ensuring that all local economies have the support of the lucrative businesses.

As a cultivator and processor, the Company will initially compete against the other approved permit holders, but is confident that its superior product will appeal to patients and other dispensaries that want to maintain a level of excellence in their products. 4Bros expects its processing system to be sought after by other cultivators and dispensaries, which will enable patients and clients to have greater access to the products the Company can guarantee.

Competitive Edge

Because of the increased control the Company will have of the processing of its plants, 4Bros anticipates that other cultivators will come for extraction of their products as well. Additionally, 4Bros expects its products to be sought after by other dispensaries due to the controllable nature of the dosage and verifiable content.

Looking to the future, the Company is hopeful for the future of the industry as more states discuss marijuana legalization, either medical or recreational. Thanks to the Rohrabacher-Farr amendment, passed in 2014, the Justice Department is prohibited from spending funds to interfere with the implementation of state medical marijuana laws. More patients are demanding medical access as the benefits are being studied and quantified, putting additional pressure on the federal government to reclassify the plant or legalize its use.

STRATEGY & IMPLEMENTATION SUMMARY

In regards to its own dispensary, 4Bros LLC, will develop a brand that communicates its core values of providing a dispensary setting in which customers in Massachusetts can purchase medical marijuana. A cohesive brand identity, including a memorable logo and all necessary marketing collateral, will transmit a clear message of these services to the Company's clients and guide the development of marketing campaigns. Due to its focus on vertical integration within its business model, the Company will manage its own seed to sale inventory, tracking every portion of the plant from its initial planting to sale. In this business to consumer aspect of the company model, 4Bros plans to utilize a direct marketing approach, leveraging digital tactics such as social networking with traditional word of mouth in a strategy specifically designed to reach new marijuana clients.

Timeline

The Company has established the following timeline and benchmarks as it begins operations:

- Created business entity – July 24, 2017
- Filing Date – October 23, 2017
- Invited to Submit Sitting Profile – not invited to submit as of December 12, 2017
- Build out – estimated, 120 days
- First grow takes – estimated, 4 to 6 months
-

Short-term

- Generate revenue at roughly one year after operational
- Establish itself as a trusted purveyor of all manner of cannabis products

Long-term

- Enhance its client base to sustain the business and support its growth objectives
- Generate enough revenue to expand operations

Marketing Strategy

4Bros will use a direct sales approach and a variety of advertising channels to increase its exposure among prospective customers. Specific channels will include:

Website: The Company will create a website to generate interest in its legal cannabis flower, extracts, edibles, and more. This website will be search engine optimized and mobile compatible, and will include product menu, strain information, regularly

updated blog, client testimony, photo gallery, company profile, location, and contact information.

Social networking: 4Bros will develop a distinctive and authentic presence on social networking sites including Facebook, Instagram, and Twitter, and may also place

advertisements on these sites as permitted by law. Customers can “like” the Company’s dispensary on Facebook or “follow” the Company’s Twitter or Instagram feed to gain access to special discounts or promotions, and the Company will regularly monitor and interact with consumers through social networking sites. About 72% of all internet users are active on social networks, while 89% of all Millennial consumers are active social network users. Almost half of all Americans report that Facebook is their primary influencer of purchase, while 63% of Millennials report using social media to stay updated on the activity of their favorite brands.²

Grand opening: The Company’s grand opening event will be designed to generate initial buzz for the Company, signaling its formal launch. This event will feature live entertainment, demonstrations, complimentary refreshments, and special discounts as permitted by law.

Special events/sponsorships: 4Bros will sponsor local events and organizations aligned with its mission in an effort to give back to surrounding neighborhoods and the overall community. This will simultaneously build awareness of the Company’s products and services while fostering

² Pick, Tom. “104 fascinating social media and marketing statistics for 2014 (and 2015).” B2C. 2014. Source: <http://www.business2community.com/social-media/104-fascinating-social-media-marketing-statistics-2014-2015-01084935>

Plan to obtain Liability Insurance

We will be using The Dowd Agencies, LLC located at 14 Bobala Road, Holyoke MA 01040 (Phone Number 413-538-7444) for our General liability and Product Liability Insurance. They are agents for Acadia Insurance Company.

Our liability insurance coverage will be \$1 Million per occurrence and \$2 Million in aggregate annually. Our deductible will be \$5000 for General Liability and \$5000 for Product Liability per occurrence.

Restricting access to individuals under 21.

Visitors-Visitors attempting to access East Coast Pharms retail, cultivation, and/or processing sites will be ask to verify age with a state issues ID.

- All visitors must be at least 21 years of age in order to enter.
- All visitors must have been scheduled prior to visiting.
- All companies performing work in our facility will be age verified before entering.
- A visitors log will be maintained and managed by our receptionist. No visitor allowed without verification, visitor registration, and badge confirmation.

Employees and Agents

- All employees must be at least 21 years of age to work in our facility.

Medical Patients

- Medical patients or card holders must be at least 18 years of age in order to access our medical area.
- Patient must have Medical Card and State ID present at time of entry.
- Medical patients will be escorted to the medical area.

Consumers

- All adult-use consumers must be 21 years of age or older.
- ID verification at the door will be required.
- ID verification at the time of sale at the registers will be required.

Quality Control and Testing Procedure

Quality Control measures include;

- Testing via Water activity (aw) meter, will be regularly performed for bud ready to exit the drying/curing process to determine if the <15% water-to-bud ratio is being attained to control growth of any mold and mildew.
- Testing will consist of measuring the weight of a sample before and after curing process.
- Bi-weekly maintenance checks on UVC germicidal lights and HEPA filter replacements done once a month.
- Air duct Socks will be replaced every month and documented on maintenance checklist.
- Air Quality monitor will be documented twice daily.

Sampling and segregation: Designated employee will remove a sample of no less than three grams from every batch of harvested, dried, usable cannabis, and no less than one gram from every batch of concentrated cannabis- derived product, and transfer the sample to an approved laboratory for testing; Testing will be done by independent testing laboratories and will include;

- Sampling and Analysis of finished Marijuana Products and Marijuana-infused Products.
- Testing of environmental media (Rockwool and water) will be performed in compliance with the Protocol.
- Testing of marijuana Cannabinoid Profile
- Testing of contaminants including but not limited to mold, mildew, heavy metals, plant growth regulators, and the presence of Pesticides.

The remainder of the batch of dried, usable cannabis or concentrated cannabis-derived product shall be segregated until the company receives the results of laboratory testing report and determines whether the batch meets the testing requirements of this rule;

Release of batch after testing: The Company may release an entire batch of dried cannabis or concentrated cannabis derived product for immediate manufacture, sale, or other use, provided that the sample taken from the batch passes the tests required in this section.

Documentation: The lead cultivator shall appropriately document the sampling and testing of all dried cannabis and concentrated cannabis-derived product, and shall utilize a department approved laboratory for the purpose of testing usable cannabis;

Each tested batch should be recorded in the internal inventory control system as well as in the state required inventory control system. The company's Standard Operating Procedures and the Inventory Control System Training Manual provide specific procedures for recording test results.

Remediation: if a sample does not pass testing or does not meet acceptable limits established in the protocols identified in 935 CMR 500.160 (1), ECP Management shall determine whether remediation is appropriate and may test another sample from the batch at issue but must send testing to the original testing lab from which it failed., or identify processes that will render the dried cannabis or cannabis-derived product safe and retest in accordance with the requirements of this section;

Notice and destruction: if the batch cannot be re-mediated to where it meets the testing requirements of this rule, the marijuana producer shall

- Notify the Cannabis Control Commission within 72 hours, and confirm the destruction and disposal of the dried cannabis or concentrated cannabis-derived product;
- Document any information regarding contamination and an assessment of the source of contamination.
- A plan detailing both the destruction of the contaminated product and the assessment of the source of contaminant MUST be forwarded to Commission.

Preservation and inspection of testing records: The lead cultivator shall maintain all results of laboratory tests conducted on cannabis or cannabis derived products produced for a period of at least 1 years, and shall make those results available to qualified patient/customers upon request as well as the commission.

Reporting: Product problems should be reported to The commission when there is a concern about the quality, authenticity, performance, or safety of any finished medical/ recreational marijuana or MIPs. Problems with product quality may occur during manufacturing, shipping, or storage. These may include:

- suspect counterfeit product;
- product contamination;
- defective components;
- poor packaging or product mix-up;
- questionable stability; and
- labeling concerns.

Testing laboratories and facility procedures are often the first to recognize a product quality problem. Individuals are encouraged to report any concerns

Facility Maintenance & Supply

Regular maintenance of production equipment is critical to maintaining product consistency, quality and safety. A formal schedule for equipment maintenance will be documented and adhered to by

management. This includes, but is not limited to:

- Thermostats and humidistats.
- PH, TDS, and Temperature meters.
- Computer systems used for tracking environmental conditions.
- Computer systems used for tracking production.
- Extraction Equipment and tools.
- Replacement of HEPA filters.
- Ovens.
- Air conditioning (cooling and heating) systems.
- Air DE-humidification systems.
- Freezers

The Director of Operations is responsible for facilitating all purchases and schedules required in order to maintain the facility and its supply. Supply Orders and maintenance may be delegated to department heads.

1. All agents whose job include contact with marijuana is subject to the requirements for food handlers.
2. Any agents working in direct contact with marijuana shall conform to sanitary practices while on duty, including Maintaining adequate personal cleanliness and washing hands appropriately.
3. Hand washing and sanitizing facilities are set up in production areas and corridors. All employee shall follow good handling and washing techniques.
4. There will be sufficient space for the placement of equipment and storage of materials for the maintenance of sanitary operations.
5. Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pest.
6. Floors, walls, and ceilings were constructed in such a manner that they may be adequately kept clean and in good repair.
7. All Contact surface, shall be maintained. Cleaned, and sanitized as frequently as necessary to protect against contamination.
8. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana.
9. All plumbing are of adequate size/design and maintained to carry sufficient quantities of water to required locations throughout the establishment.
10. Employee restrooms are located in the front for sale-agents and security use and in the cultivation and manufacturing area for easy access.

Personnel Policies

Staffing Plan and Records

Cultivation- 8 Cultivation Agents

Cultivation staff, Each Cultivation grow room will utilize two agents for the purpose of care, canopy maintenance, LST management, watering and analyzing of any pest and/or mold or deficiencies.

Trimming- 10 Harvesting Agents

The trimming room will include a manager, assistant manager and 8 Trimmers. Manager and assistant manager will coordinate daily production assignments

Kitchen/Manufacturing- 6 Manufacturing Agents

Manufacturing will include a Supervisor and 5 manufacturing agents in charge of our daily production goals.

Retail- 14 Sales agents

Our retail operation will consist of 1 manager, 1 assistant Manager and 12 Retail agents assigned daily. Daily assignments may include greeter, consultations, and/or retail floor helper.

Security- 3 Security personnel

Our security team will consist of 1 head of security and 2 verification and monitoring security agents. Assignment will be rotated to include camera monitoring and retail floor monitoring.

Inventory Control specialist will also act as the facility assistant manager. General Manager will monitor all plans and policies to meet performance.

Human resources (2) and Consultation agent will alternate positions.

All personnel records will be kept in a locked file cabinet and only accessible to limited personnel.

Confidential Information

Company information is only for the use of ECP., and not to be used outside of the company. An employee should know what files or materials he is permitted to access in the office and he/she should adhere to that. Under no circumstances should these files be shared or given to unauthorized people. This is because if it reaches the wrong hands, it can be considered as a breach of confidentiality and the employee may even be dismissed for it. Also, employees should not discuss any business dealings with the clients, outside work.

- All Employees will be given a job description upon hire and kept in their personal file.
- All files will be kept locked and limited to certain agents.
- All electronic copies of confidential information will be kept in the director of operations computer with an external back-up updated regularly.
- A personnel record will be maintained for each agent working and maintained for 12 months after termination.
- All employees must undergo a criminal background check. No employee will be allowed that has a felony on his/her criminal record. If an employee is convicted of a serious crime while employed by ECP they shall notify administration in writing.
- Patient/customers will trust ECP. to maintain their confidentiality and care. Due to the nature of our business, ECP. strongly discourages employees from developing personal relationships with patient/customers.
- All information gained and created while employed at ECP., is property of the company and may not be taken when leaving the company. Taking this information will be considered theft and ECP will enforce this to the full extent of the law.
- Any disclosure of confidential information will result in disciplinary action.
- Employees will be trained on HIPAA and how it pertains to our business and the patient/customer's privacy and confidentiality.
- ECP will stay in compliance with HIPAA guidelines and state and local laws established regarding confidentiality. Any violation of these policies will result in disciplinary action.

Employee Conversations:

- Employees are prohibited from conducting personal conversations while in the presence of the public.
- The only conversations that should take place in public are between employees and patient/customers.
- Also, one should refrain from sharing any personal details with fellow colleagues at work. This helps to maintain a professional attitude at work.

Electronic Communications:

- Use of company communication devices for personal reasons is strictly prohibited. This includes chatting online, accessing blogs or social networks of any kind.
- Company communication devices are to be used for business matters only.
- Use of personal communication devices, including personal phones, is to be used during break times and must be put away. No cell phones past the clean room.
- Employees are not allowed to download anything from the Internet using company computers. Anything that is to be downloaded from the Internet is to be done or approved by the General Manager which will override restrictions set forth.

All access codes and passwords will be given only to designated employees. Security access passwords to confidential patient/customer or company information will only be available to the management of ECP., or entrusted employees as needed.

Employee's personal cell phones must be turned off during operational hours. The company provides lockers or locking cabinets for safe storage of employee's personal belongings. 24-hour surveillance will assist in deterring theft or excessive use of personal belongings and matters.

Employees will limit re- entry as much as possible. Any employee with excessive in/out poses a higher risk of cross contamination. This risk the quality of our products. This is a punishable offense that may terminate employment.

Alcohol, Smoke and Drug-Free Work Place

ECP is an alcohol, smoke and drug-free workplace. The purpose of this policy is to ensure the safety of all employees and to promote productivity. This policy applies to all employees, contractors, and temporary workers. Substances covered under this policy include alcohol, illegal drugs, inhalants, and prescription and over-the-counter drugs. We reserve the right to inspect our premises for these substances. We reserve the right to conduct alcohol and drug tests at any time. We may terminate your employment if you violate this policy, refuse to be tested, or provide false information.

Definitions under this policy

A “**substance**” includes alcohol, illegal drugs, inhalants, and prescription and over-the counter drugs.

An “**illegal drug**” is any substance that is illegal to use, possess, sell, or transfer.

“Drug paraphernalia” are any items used or intended for use in making, packaging, concealing, injecting, inhaling, or consuming illegal drugs or inhalants.

A “**prescription drug**” is any substance prescribed for an individual by a licensed health care provider.

An “**inhalant**” is any substance that produces mind-altering effects when inhaled.

You are “**under the influence**” if any substance:

- impairs your behavior or your ability to work safely and productively; results in a physical or mental condition that creates a risk to your own safety, the safety of others, or company property; or
- is shown to be present in your body, by laboratory evidence, in more than an identifiable trace.
- “Company premises” include our buildings, grounds, parking lots, and company-provided vehicles.

Employees must follow the rules while they are on company premises and while conducting company business. The rules apply to any place the employee conducts company business, including a company vehicle:

1. You may not use, possess, or be under the influence of alcohol on company premises.
 2. You may not use, possess, or be under the influence of illegal drugs.
 3. Employees with valid medical marijuana patient cards may purchase medication during non working hours, but should not loiter on the premises.
 4. You may not sell, buy, transfer, or distribute any drugs, with the exception of purchasing and distribution of medical marijuana in accordance with state laws and company distribution policies. It is against the law to do so, and we will report such actions to the authorities.
 5. You may not use, possess, sell, buy, transfer, or distribute drug paraphernalia, other than those in compliance with State Medical Marijuana Laws and in accordance with company policy.
 6. You must follow these rules if you take prescription or over-the-counter drugs on the job.
- You may use a prescription drug only if a licensed health care provider prescribed it for you within the last year.
 - You may use prescription or over-the-counter drugs only if they do not generally affect your ability to work safely.
 - You must follow directions, including dosage limits and usage cautions.
 - You must keep these drugs in their original containers or bring only a single-day supply. The company may consult with a doctor to determine if a prescription or over-the-counter drug may create a risk if you use it on the job. The company may change your work duties or restrict you from working while you are using any medication that creates such a risk.
 - 7. You may not use machinery while taking prescription or over-the-counter drugs and/or marijuana that impair your ability to work safely. This includes vehicles.
- You must cooperate with any investigation into substance abuse. An investigation may include tests to detect the use of alcohol, drugs, or inhalants.

Post-Offer Testing

Prior to beginning work for ECP, all those to whom an offer of employment is made will be subject to substance abuse testing. A positive finding for which the individual cannot offer an acceptable explanation will generally result in withdrawal of the offer of employment.

Post-Accident / Injury Testing

If a workplace accident occurs causing injury to an employee or damage to property under circumstances that raise a question about possible substance abuse, the employee may likewise be subject to substance abuse testing.

Reasonable Suspicion

The Company may require an employee to submit to a substance abuse test if the employee's supervisor or another individual in a management position reasonably suspects that the employee is using, is Under the Influence of, is in the possession of or is unlawfully distributing substances or has otherwise violated this policy's prohibitions with respect to substances.

The following is a non-inclusive list of factors that may lead to reasonable suspicion under this policy:

- Odors (i.e., smell of alcohol or marijuana)
- Movements (unsteady, fidgety, dizzy)
- Eyes (dilated, glassy, constricted, watery, involuntary eye movements)
- Face (flushed, sweating, confused or blank look, constant sniffing, redness under nose)
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts)
- Indicia of drug use (needle marks, possession of drug paraphernalia)
- Personality (change in personality, argumentative, agitated, irritable, forgetful)
- Other observations (extreme drowsiness, sleeping, unconsciousness, slowed reaction rate, erratic behavior)
- Abnormally dilated or constricted pupils
- For Marijuana Use:
 - Red, blood-shot eyes
 - Poor concentration
 - Impaired perception of time
 - Loss of energy
 - Impaired perception of distance

Any agent who had diverted marijuana, engaged in unsafe practices, or have been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor will be immediately dismissed.

Workplace Searches:

Management may conduct searches of Company property, including lockers, and an employee's personal property in cases where there is reason to suspect a violation of this policy. An employee who refuses to consent to and/or cooperate in the conducting of such searches may be subject to disciplinary action up to and including termination of employment.

If there is reason to suspect that the employee is working while under the influence of an illegal drug or alcohol, the employee may be suspended until the results of the substance abuse test are made available to the Company.

The Company reserves the right to suspend, with or without pay, any employee who has been arrested or charged with a criminal offense pending resolution of the charges to the Company's satisfaction. The Company reserves the right to take such action as it deems appropriate under the circumstances, including termination. Employees who are charged or convicted or any substance related violation under state or federal law, including employees who plead guilty or nolo contendere (i.e., no contest) to such charges must inform the Company. Failure to do so may result in disciplinary action, up to and including termination.

Personal Appearance & Hygiene

1. Employees must present themselves in a clean and odor-free fashion.
2. Employees will be required to wear appropriate attire. This will let patient/customers know exactly who is an employee of ECP, as well as project a professional appearance.
3. Employees must wash their hands after eating, smoking, using the bathroom and after break time.
4. Personal expression is welcome as long as it is consistent with our professional image.
5. All employees must maintain proper grooming and hygiene. Any employee with a beard or mustache must keep them well groomed.
6. Pungent perfumes or colognes are prohibited from being used by any employee during work hours.

Should any supervisor need to address Personal Appearance or Hygiene issues, supervisors should address this topic in a private setting and in a professional manner. Employees may be sent home or subject to disciplinary procedures enforced by immediate supervisors for hygiene or uniform violations.

Time Off

- A. Tardiness and Missed Work:
 1. All employees are required to be at their workstations, ready to start work at the beginning of their assigned work shifts.
 2. Traffic or weather conditions, with the exception of natural disasters or emergencies, are not excusable reasons for missing work.
 3. Employees that are going to be late or miss work are required to contact the appropriate supervisor in a reasonable amount of time before their shift begins or as soon as possible.
 4. Repetitive tardiness is taken seriously and may lead to disciplinary action up to and including discharge.
- B. Jury Duty:
 1. Employees will be provided time off with pay to comply with state and federal wage laws if summoned for jury duty.
 2. Employees are expected to return to work once relieved of jury duty.
- C. Military Leave:
 1. Employees required to fulfill military obligations in any branch of the US Military will be given the necessary time off and reinstated in accordance with federal and state law.
 2. The time off will be unpaid, unless state or federal laws dictate otherwise.
 3. Employees are required to present documentation of required military as early as possible.

Employee Discount & Benefits

- A. ECP employees are allowed a company discount on all company products.
- B. Employees must never ring themselves up for a sale.
- C. All employee purchases must comply with state regulations.
- D. Employees may not use their discount for patient/customers or anyone else. Limits will be established.

Record Keeping

All records of this marijuana establishment will be made available for inspection by the commission, on request. All record will be maintained in accordance with generally accepted accounting practices. All records required in 935 CMR 500.000 in addition to Written operating procedure, Inventory records, and seed to sale tracking of all products.

- All Employees will be given a job description upon hire and kept in their personal file.
- A personnel record will be created for each agent hired and maintained for 12 months after termination.
- All relevant agent information required pursuant to 935 CMR 500.030 (2) will be kept on file.
- Reference verification will be completed for each individual and documented.
- Documentation of all required training including notice of completed responsible vendor, on-duty training, privacy/confidentiality training and security will be maintained as well as a sign off on training subject, place of training, instructor, and date and time.
- Performance evaluations will be done every 6 months of employment. Evaluation worksheet must be filed with personnel file.
- All incident report forms and disciplinary actions taken against an employee will be reported and filed.
- All employees must undergo a criminal background check as required by M.G.L c. 6 § 172, 935, CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI). No employee will be allowed that has a felony on his/her criminal record. If an employee is convicted of a serious crime while employed by ECP they shall notify administration in writing.

Staffing & Hiring

Who: The Human Resource Representative and Department Managers will work together to collect all required hiring documents.

What: The company will use the ECP New Hire Checklist to ensure all required forms have been completed. HR Reps and Department Managers will initiate a Personnel file for each employee, including at least the documents as required by SOP's.

The company's commitment to creating a diverse workplace and safe business environment.

Where: Initial application and hiring procedures can be done both online, through telecommunication and should include multiple in person collaboration to complete all

elements of the Personnel File.

When: The initial hiring process should be completed within the company's probationary period of 90 Days. Personnel files should be reviewed for completion after 90 Days and at least annually or as necessary to maintain an up to date and complete personnel file.

Why ECP is committed to protecting the privacy and integrity of employee files. We also want to ensure all personnel are receiving the attention they deserve.

How Initial hiring procedures can be done both online, through telecommunication and should include multiple in person collaboration to complete all elements of the Personnel File.

Records of Hiring should be maintained in a safe and secure place. Records will be maintained electronically in the company's Inventory Control System and Business Management System: Often referred to as the "electronic database". The Company will provide an Inventory Control System Training Manual. Some records may be stored in other secured file sharing platforms including DropBox, Box, and Google Drive or on a secured server. A Master Personnel File should be stored in safe and secured areas. Copies of Personnel Documents should be kept in a safe or fireproof vault and will be made available upon request from the employee.

Personnel Files

Who The Director of Operation in collaboration with human resources will maintain a personnel file on each employee.

What The file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Where Personnel files are the property of 4Bros, Inc. and access to the information they contain is restricted. Only management of ECP is allowed to review these files. Files should be stored in a secure electronic database. All hard copies should be secured in a locked cabinet, vault or safe with restricted access.

When The initial hiring process should be completed within the company's probationary period of Personnel files should be reviewed for completion after 90 Days and at least annually or as necessary to maintain an up to date and complete personnel file.

Why ECP is committed to protecting the privacy and integrity of employee files. We also want to ensure all personnel are receiving the attention they deserve.

How Personnel records will be maintained both in hard form and electronically in the company's electronic records system. A Master personnel file should be stored in safe and secured areas. Copies of personnel documents should be kept in a safe or fireproof vault and will be made available upon request from the employee. Only key personnel will have access

to employee records.

Maintenance of Financial Records Plan

- We prohibit the utilization of software or other methods to manipulate or alter sales data.
- We will conduct a monthly inspection and analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sale data.
- A record will be maintained monthly of the analysis completed.
- Any signs of software or other devices used to alter the sale data will be reported to the commission. We will cooperated with any investigations and wait for directives from the commission.
- Separate accounting will be kept for marijuana products and non-marijuana products.
- As a co-located retailer we will maintain and provide to the commissioner on a biannual basis, accurate sales data during the six months immediately preceding this application to ensure an adequate supply of marijuana and MIP.

We will Comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record-keeping requirements.

Business Records

Who: Human Resources & Upper Management

What: ECP should maintain:

Business Documents – including Tax Documents, Business Licenses, Zoning Permits, Business Plans, Original P&P's, SOP's, Assets, Monetary Transactions, binder of accounts, ledgers agreements, checks, invoices, and vouchers.

A List of Vendors & Employees

A Master List of Company Passwords & Key Personnel Contact information.

All Business Documents should be kept in a safe and secure location and accessible to all critical and approved personnel.

Where: Business Records should be maintained electronically and backed up in a safe and secure location. When necessary, business records should be maintained on site and accessible to appropriate personnel.

When: Business Records should be recorded digitally immediately upon receipt and stored in a place in which it is accessible for the required amount of time for each document.

Why: It is important Business Records be organized and accessible for reference during any type of business audit, including those required by the state regulatory agency.

How: Most Business records will be maintained electronically in the company's Inventory Control System, The Company will provide an Inventory Control System Training Manual. Some records may be stored in other file sharing platforms including DropBox, Box, and Google Drive or on a secured server. Other Business Documents should be stored in safe and secured areas. Copies of Original Business Records and Documents should be kept in a safe or fireproof vault.

ECP will maintain sale records including quantity, form and cost of marijuana products.

Ecp will maintain a list of salary and wages for all employees, or stipend, including executive compensation, bonuses, benefits, or items of value paid to any person having direct or indirect control of the establishment.

ECP will pay and maintain all records after closure for at least two years.

New Hire Orientation Training Procedures

Cultivation- 8 Cultivation Agents

- Cultivation staff, Each Cultivation grow room will utilize two agents for the purpose of care, canopy maintenance, LST, watering and analyzing of any pest and/or mold or deficiencies. Basic growing knowledge preferred but not required.

Trimming- 10 Harvesting Agents

- The trimming room will include a manager, assistant manager and 8 Trimmers. Manager and assistant manager will coordinate daily production assignments. Management positions requires 2 year experience unless hired from within, a person may qualify without the 2 year experience as part of our diversity and equity program. Trimmers-Basic trimming knowledge preferred but not required.

Kitchen/Manufacturing- 6 Manufacturing Agents

- Manufacturing will include a Supervisor and 5 manufacturing agents in charge of our daily production goals. Management position requires 2 year management experience unless hired from within, a person may qualify without the 2 year experience as part of our diversity and equity program. Manufacturing experience preferred but not required.

Retail- 14 Sales agents

- Our retail operation will consist of 1 manager, 1 assistant Manager and 12 Retail agents assigned daily. Daily assignments may include greeting, consultations, and/or retail floor helper. Management position requires 2 years management experience unless hired from within, a person may qualify without the 2 year experience as part of our diversity and equity program. Bud-tender experience preferred but not required.

Security- 3 Security personnel

- *Our security team will consist of 1 head of security and 2 verification and monitoring security agents. Assignment will be rotated to include camera monitoring and retail floor monitoring. Head of Security must have prior law enforcement or military experience. Security detail agents(verify and monitor) experience preferred but not required.*

Inventory Control-1 Agent

- *Inventory Control specialist will also act as the facility assistant manager. 2 Years experience needed.*

Human Resources

- Human resources (2) and Consultation agent will alternate positions. Experience preferred but not required.

All employees will be trained on the job specific prior to performing job functions and receive at least 8 hours of ongoing training a year. All employee will complete the responsible

vendor program within 90 days of being hired and all records of training will be retained stored for at least four years.

Who Employees and Department Managers will have 90 days from hire to complete all requirements of New Hire Orientation. The Director of Operations is responsible for the overall performance of this procedure. Department Managers will be responsible to ensure all staff working under their supervision is trained.

What ECP will ensure complete New Hire Orientation Training. This training will require employees to understand the employee handbook, safety and security policies and procedures, HIPAA/Security Rules, hazardous materials identification, facility familiarization and the employee's job description.

Each ECP employee will receive a New Employee Orientation training from the designated manager or trainers. Training will include but will not be limited to:

Review of the Employee Handbook, which include policies.

Safety and Security Training & Material to include review of policies and procedures detailed in the Security Plan for each department. All training should include the proper use of security measures, controls and procedural instructions on how to respond to an emergency, including a robbery or violent accident. New hires will receive comprehensive safety training.

Legal & Compliance Training: Introduction to matters of law and compliance on the state and federal level.

Review of professional conduct and ethics.

Facility Familiarization

Responsible vendor training

Review of the employee's job description and responsibilities

Specific training for each department

HIPAA: All ECP employees, working with patient/customer records must complete HIPAA Training and receive certification after their hire date.

The HIPAA Security/Privacy Rule: The HIPAA Security/Privacy Rule provides state and federal protections for individually identifiable health information held by covered entities and their business associates and gives patient/customers an array of rights with respect to that information. At the same time, the Privacy Rule is balanced so that it permits the disclosure of health information needed for patient/customer care and other important purposes.

The purpose of the ECP, New Hire Orientation is to provide employees with the knowledge and tools necessary to reduce safety risks to the lowest possible level. Training programs are developed in response to federal, state, and local regulations.

Management is responsible for:

1. Identifying safety-training needs.
2. Ensuring that these requirements are communicated to employees.
3. Monitoring compliance with safety training requirements.
4. Providing training materials, assistance, and programs to address safety requirements.
5. Assisting employees on how to identify and to provide the training for specific workplace hazards.
6. Conduct and document training.
7. Being trained and knowledgeable in the safety and health hazards to which employees may be exposed.
8. Establishing, implementing, and maintaining a system for communicating with employees about health and safety matters.
9. Providing workplace specific training for employees to include the specific hazards present in the workplace.
10. Requesting assistance with specialized training where needed.
11. Ensuring that all employees under their supervision have completed all safety training requirements.
12. Ensuring that training is documented and in personnel files. Employees are responsible for participating in the required training programs provided. Training will be documented at the time training is taken and filed in personnel files. Safety policies and training requirements will be based on job-specific requirements. Management must evaluate each position at the time the position is established to determine the exposure potential by hazard type for each employee. Additional safety training requirements may be identified, workplace specific training to employees to include the specific hazards associated with each job. At a minimum the following elements should be included in the training sessions:
 13. A review of the workplace specific safety policies.
 14. Specific training on the hazards associated with the materials and equipment used by the employee.
 15. Specific training on how employees are to protect themselves against the hazards in the workplace.
 16. Recognition and assessment of health and safety risks.
 17. Basic information on the location of safety devices, and personal protective equipment (PPE).
 18. Basic procedures to follow in the event of emergencies, especially fires, chemical spills,

and medical emergencies.

Safety procedures are discussed in detail in the Security & Safety section of this document.

Where Initial training procedures can be done both online, through telecommunication and should include multiple in person collaboration to complete all elements of the New Hire Orientation.

When New Hire Orientation should be completed within the company's probationary period of 90 Days. Training should be reviewed after 90 days and again annually, as SOPS change or as needed.

Why While many aspects of the New Hire Orientation can be done in the first few weeks of training, the cannabis industry is very complex and requires comprehensive understanding of a regulated industry. We also want to ensure all personnel is receiving the attention they deserve. In addition to good practice, maintaining personnel files is required by the state.

How Initial hiring procedures can be done both online, through telecommunication and should include multiple in person collaboration to complete all elements of the Personnel File.

Records of Hiring should be maintained in a safe and secure place. Records will be maintained electronically in the company's Inventory Control System and Business Management System : Often referred to as the "electronic database". The Company will provide an Inventory Control System Training Manual. Some records may be stored in other secured file sharing platforms including DropBox, Box, and Google Drive or on a secured server. A Master Personnel File should be stored in safe and secured areas. Copies of Personnel Documents should be kept in a safe or fireproof vault and will be made available upon request from the employee.

Training Records

Who Department Managers will have 90 days from hire to complete all requirements of New Hire Orientation. The Director of Operations is responsible for the overall performance of this procedure. Department Managers will be responsible to ensure all staff working under their supervision is trained.

What Management will keep training records including who was trained, the date, the name of the trainer, when the training occurred, and the topics covered by the training. Documentation should include safety meeting or training session agendas, sign-up sheets and signature of the attendees, and copies of any written communications. These records will be maintained in personnel files.

Exposure Determination Safety training requirements for a position are determined through a process of exposure determination at the time a position is established. These exposure

determinations identify the employee's potential for exposure to hazardous materials or environments and determine the job specific safety training requirements. Additional exposure assessments may be performed by management.

As new hires complete training human resources and management will be responsible to record all levels of access including but not limited to usernames, passwords, permission levels, fab numbers, and id numbers.

Where Training can be completed both online and through telecommunication and should also include on the job training to include all duties of their job position. Various departments will require different forms of training, which may include off site training.

When Training should be reviewed after 90 days and again annually, as SOPS change or as determined needed by department managers or administrators.

Why While many aspects of training can be done in the first few weeks of employment, the cannabis industry is very complex and requires comprehensive understanding of a regulated industry. Ongoing training is required to ensure compliance and safety.

How Training procedures can be done both online, through telecommunication and should include training of all major job responsibilities. All training should be recorded in a Personnel File.

Records of Hiring should be maintained in a safe and secure place. Records will be maintained electronically in the company's electronic enterprise resource planning system.

The Director of Operations will ensure all employees receive:

The Company will keep an Employee Handbook up to date with details of employee training and informational developments in the field marijuana.

Qualifications

Some basic qualifications may gain some input into the hiring of an individual for management, but it does not disqualify any applicants.

- We will train and oversee all employees to assure they follow policy and procedure to produce quality products.
- Experience is needed as a Lab tech for extraction (2 years). We will train said individuals on specifics procedures on obtaining our desired products. Including training manuals for our Apeks supercritical CO2 extractor. Safety-training and operational guidelines.
- Customer Service experience will be required for bud-tenders of one year (1 year)
- Management will need experiences of at least two years (2 Years).

- Assistant department managers require no previous experience these positions will be reserved for our higher learning initiative.
- Growers require basic knowledge of nutrients, deficiencies and pest management. Growers will have a detailed work description and will be monitored for accuracy.

Plan for separating Medical and Adult-use Operations

1. ECP will reserve 35% of the MTC marijuana products for the first 6 months of dispensing.
2. ECP will maintain a quantity and variety of marijuana for patients after our first 6 months of dispensing, that meets the demand indicated by an analysis of the sale data collected during the preceding 6 months.
3. ECP will Maintain and provide biannual basis accurate sales data collected during the six months for the purpose of ensuring an adequate supply of marijuana.
4. Marijuana Products reserved for patients supply will, unless unreasonably impracticable, reflects the actual types and strains of marijuana products documented during the previous 6 month. In the event that a substitution must be made, the substitution shall reflect the type and strain no longer available at the retailer as closely as possible.
5. Quarterly, the retailer shall submit to the commission an inventory plan to reserve a sufficient quantity and variety of marijuana for registered patients. On each occasion that the reserved patient supply is exhausted, and a reasonable submission cannot be made, the retailer shall submit a report to the commission.
6. A separate private area located off the entrance will be utilized as a patient consultation area. Signage will state "Consultation Area".
7. We will have a designated line for sales of medical and adult-Use, Patients may use either lines.
8. ECP will have physical separations between medical and adult-use of sales areas.
9. This system is set up to show inventory in our medical catalog. All sales in this POS is tax free and will required patient information and verification on amounts left to be dispensed.
10. ECP will perform audits of patients supply available at the establishment on a weekly basis and retain those records for a period of six months.
11. ECP may transfer marijuana products reserved for medical-use within a reasonable period of time prior to date of expiration provided that the product does not pose a risk to health or safety.
12. We will prioritize medical patients and caregivers identification verification and physical entry into its retail space.

Designation

1. Each customer/patient will be greeted and asked if they are there for medical or recreational.
2. Each customer will be guided to their designated bud-tender which will have a system set-up for sale of adult-use or medical.
3. Each plant grown will be designated by either Rec or med in our inventory control system.
4. Inventory room will consist of medical section as well as adult-use section.

Diversity Plan

A diverse workforce ensures that some employees will be analytical, while others will have more creative propensities. Diverse approaches to the same problem generate new insights and enhance efficiency--both attractive qualities to prospective employees.

Goals

Our goal is to promote equity for minorities, women, veterans, people with disabilities and LGBTQ+ by;

1. Increasing the number of individuals working for this establishment of whom we want to promote equity to.
2. Promote inclusion.
3. Decrease number of systematic barriers by Retaining, Maintaining, and Refreshing policies to meet or exceed our goals.
4. Training employees to make a positive productive workforce for all.

Programs

1. Working with local diverse organizations like Nueva Esperanza with a set focus on strategic initiatives within our scope to promote equity including hiring, education and training.
 - Hiring priorities will be given to referrals from our local partners. Job postings in diverse publications and areas that meet our the target demographics.
2. All initial hiring will be given preference to Holyoke residents, which is 52% Hispanic.
 - 6 months after start, we will incorporate a “Higher Learning Initiative” to expand our supervisory employees in attempt to add an assistant supervisor per department giving preference to individuals whom we are promoting equity.
 - Higher learning initiative will consist of individuals already in the industry or wanting to get into the industry, looking to get into the business or looking to get into management status including board members.

- This initiative will include one on one shadowing, management training and hands on training.
3. To identify, observe and engage in identifiers of systemic barriers and adjust policies, training and education.
 - A survey will be given to each employee every 6 months requesting information on ways to make workplace improvements to help identify and adjust.
 4. Diversity training and practices will be our benchmark to how productive the companies employee are. Consistency and a daily practice of company behavior policies is essential to this companies positive and productive workplace. We are committed in keeping respect love and kindness as our model and will lead the industry in zero tolerance of anything beyond that.
 - Subjects of training will include respect in the workplace, alternative lifestyle acceptance, ethics and cultural differences, gender diversity, and creating a fair and comfortable work environment for disabled employee and veterans.

Measurements

We understand that it is important to be consistent in measuring the effects our goals and programs to better understand and provide changes that meet or exceed our outcome. A binder has been created to monitor all and to better identify issues as we move forward with providing equity to those individuals whom we want to promote.

1. We will monitor all hires with originating referrals to meet our 50% Minority hire to match our local demographics and to promote equity for minorities, women, veterans, people with disabilities and LGBTQ+.
 - All applicants will be asked “where did you hear about us” as one way to keep metrics of individuals we want to promote equity to.
 - We will keep metrics on where the publications for hire were submitted with supporting documents.
 - We will post in the local free bilingual paper once a month to target areas most impacted.
2. We will keep a metric of how many individuals whom we will promote equity to

are in higher management position or have obtained promotions through our Higher Learning Initiatives. As well as number of positions created. We want to achieve and maintain 50% or more.

3. We will promote surveys for employees to monitor systematic barriers and adjust policies, training and education accordingly.

- Our main focuses that can cause systematic barriers are respect in the workplace, alternative lifestyle acceptance, ethics and cultural differences, gender diversity, and creating a fair and comfortable work environment for disabled employee and veterans.
- We will conduct and analyze surveys every 6 months to properly identify barriers early on.
- A Report on the findings will be recorded every 6 months
- Our goal is 75% positive feedback.

4. Number of training and educational meetings held since start.

- We will record subject matter in training and employees in attendance. Our goal is engage employees in specific training's geared into cultural differences, respect in the workplace and social equality.
- Our goal is to provide educational and diversity training every 6 months.
- Our goal is for all employees to pass the summary in training exam with a 80% or more.

We acknowledges and are aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and

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

All progress and success will be documented one year from provisional license and each year thereafter.