



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC283511  
Original Issued Date: 11/12/2021  
Issued Date: 11/12/2021  
Expiration Date: 11/12/2022

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: 620 Industries Inc.

Phone Number: 413-250-2181 Email Address: o.breton@greengrab.biz

Business Address 1: 620 Beaulieu St Business Address 2:

Business City: Holyoke Business State: MA Business Zip Code: 01040

Mailing Address 1: 620 Beaulieu St Mailing Address 2:

Mailing City: Holyoke Mailing State: MA Mailing Zip Code: 01040

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 Percentage Of Control: 100  
Role: Owner / Partner Other Role:

First Name: Odaliz	Last Name: Breton	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)		
Specify Race or Ethnicity:		

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: John	Last Name: Muise	Suffix:
Describe the nature of the relationship this person has with the Marijuana Establishment: Mr. Muise is an officer of 620 Industries.		

#### CAPITAL RESOURCES - INDIVIDUALS

No records found

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: John	Last Name: Muise	Suffix:
Marijuana Establishment Name: Faded, LLC	Business Type: Other	
Marijuana Establishment City: Bellingham	Marijuana Establishment State: MA	

Individual 2

First Name: Odaliz	Last Name: Breton	Suffix:
Marijuana Establishment Name: Greengrab Inc.	Business Type: Other	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 3

First Name: John	Last Name: Muise	Suffix:
Marijuana Establishment Name: Greengrab, Inc.	Business Type: Other	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 620 Beaulieu Street	
Establishment Address 2:	
Establishment City: Holyoke	Establishment Zip Code: 01040
Approximate square footage of the Establishment: 5500	How many abutters does this property have?: 17
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	
Cultivation Tier:	Cultivation Environment:

#### FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet    Cultivation Environment: Indoor

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	620 Industries - HCA Certification.pdf	pdf	609b09b709011007a03d256b	05/11/2021
Plan to Remain Compliant with Local Zoning	PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING-ORDINANCES_620_INDUSTRIES.pdf	pdf	609b0ab53fd8b2075df9eba2	05/11/2021
Community Outreach Meeting Documentation	04.09.20_Form_COM_Attestation_620.pdf	pdf	60b0510631b11b361021f306	05/27/2021

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	PLAN FOR POSITIVE IMPACT_620_INDUSTRIES_revised.pdf	pdf	60ff648c35907208a4671cd5	07/26/2021

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner      Other Role:  
First Name: Odaliz      Last Name: Breton    Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

Individual Background Information 2

Role: Executive / Officer      Other Role:  
First Name: John      Last Name: Muise    Suffix:  
RMD Association: Not associated with an RMD  
Background Question: yes

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload
-------------------	---------------	------	----	--------

					Date
Articles of Organization	620 Industries Inc Articles of Incorporation.pdf	pdf	609bd26d68436d078d6b406e		05/12/2021
Bylaws	620 Bylaws.pdf	pdf	609bd2788ecb05074fe6b91a		05/12/2021
Secretary of Commonwealth - Certificate of Good Standing	CertGoodStandingSecState_620.pdf	pdf	609bd4096f8420077bfc8b0a		05/12/2021
Secretary of Commonwealth - Certificate of Good Standing	620 Unemployment Assistance Attestation.pdf	pdf	609d37feb15b200795553580		05/13/2021
Department of Revenue - Certificate of Good standing	DOR cert good standing_620 Industries.pdf	pdf	60c126570e03aa2187d96512		06/09/2021

No documents uploaded

Massachusetts Business Identification Number: 001493376

Doing-Business-As Name:

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	PROPOSED TIMELINE TO BECOME OPERATIONAL_620_INDUSTRIES.pdf	pdf	609bdd71b15b200795553089	05/12/2021
Plan for Liability Insurance	PLAN TO OBTAIN LIMITED LIABILITY INSURANCE_620_INDUSTRIES.pdf	pdf	609bdea88f80610756a13b2e	05/12/2021
Business Plan	Business Plan Summary 620 Industries.pdf	pdf	60ad73aa5584fe07c3fa5998	05/25/2021

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	POLICIES AND PROCEDURES FOR CULTIVATING.pdf	pdf	609c4f233fd8b2075df9f056	05/12/2021
Restricting Access to age 21 and older	PLAN TO RESTRICT ACCESS TO 21 YEARS OF AGE_620_INDUSTRIES.pdf	pdf	609c4fad09011007a03d29c2	05/12/2021
Prevention of diversion	PREVENTION OF DIVERSION PLAN_620_INDUSTRIES.pdf	pdf	609c50873bbe600765b4ec9b	05/12/2021
Inventory procedures	INVENTORY PLAN_620_INDUSTRIES.pdf	pdf	609c52f62e7a1d0770d0a87c	05/12/2021
Quality control and testing	QUALITY CONTROL AND TESTING PROCEDURES_620_INDUSTRIES.pdf	pdf	609c53bb09011007a03d29d2	05/12/2021
Personnel policies including background checks	PERSONNEL POLICIES_620_INDUSTRIES.pdf	pdf	609c55626f8420077bfc8e73	05/12/2021
Maintaining of financial records	MAINTENANCE OF FINANCIAL RECORDS POLICY_620_INDUSTRIES.pdf	pdf	609c56b58f80610756a13ecc	05/12/2021

Qualifications and training	QUALIFICATIONS AND INTENDED TRAINING_620_INDUSTRIES.pdf	pdf	609c575b6f8420077bfc8e7a	05/12/2021
Energy Compliance Plan	ENERGY COMPLIANCE PLAN_620_INDUSTRIES.pdf	pdf	609c58f93bbe600765b4ecb0	05/12/2021
Storage of marijuana	STORAGE PLAN_620_INDUSTRIES_revised.pdf	pdf	60c163600e03aa2187d9659a	06/09/2021
Transportation of marijuana	TRANSPORTATION PLAN_620_INDUSTRIES_revised.pdf	pdf	60c167030e03aa2187d965a1	06/09/2021
Record Keeping procedures	RECORD KEEPING POLICIES_620_INDUSTRIES_revised.pdf	pdf	60c263d21853542108e1b5a8	06/10/2021
Security plan	SECURITY PLAN 620 Industries_revised.pdf	pdf	60c26ce51daf99210f8e87d3	06/10/2021
Diversity plan	DIVERSITY PLAN_620_Ind_revised.pdf	pdf	60ff6631b27f97082de35e30	07/26/2021

### 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 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:

### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

### COMPLIANCE WITH DIVERSITY PLAN

No records found

### HOURS OF OPERATION

Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

Date generated: 12/01/2021

## Host Community Agreement Certification Form

### Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. 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(2) and 501.400(2).

### Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

1. Name of applicant:

620 INDUSTRIES INC

2. Name of applicant's authorized representative:

Odaliz Breton

3. Signature of applicant's authorized representative:



4. Name of municipality:

City of Holyoke

5. Name of municipality's contracting authority or authorized representative:

Terence Murphy, Acting Mayor

6. Signature of municipality's contracting authority or authorized representative:



7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

MurphyT@Holyoke.org

8. Host community agreement execution date:

4/12/21

## **PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING-ORDINANCES.**

---

620 Industries, Inc. ("620 Industries") will, at all times, remain compliant with the local zoning requirements as set forth in the Holyoke Zoning Ordinance and any other additional requirements imposed by local or state governments. 620 Industries' location at 620 Beaulieu St, Holyoke MA, is within the Industrial General "IG" Zoning District and is a permitted use pursuant to the Holyoke Zoning Ordinance, Section 7.10 ("Marijuana Facilities").

The Zoning Ordinance requires 620 Industries to apply for and be issued a Special Permit from the City Council to operate. 620 Industries is in compliance with Section 7.10.4 which provides that any cultivation facility shall not be located within 200 feet of any pre-existing public or private school. 620 Industries will operate in compliance will Section 7.10.5 (Operational Requirements)

620 Industries is in the process of obtaining a special permit from the City of Holyoke in accordance with Section 7.10.6 and will fully comply with all conditions attached to the special permit. 620 Industries will apply for any additional required local permits, and shall obtain building permits and any other local approvals as applicable. 620 Industries will fully comply with all conditions and requirements in all other local permits.

620 Industries will maintain regular and open communication with Holyoke officials, and work cooperatively with the municipality to ensure that 620 Industries remains fully compliant with local laws, regulations, rules, codes and conditions regarding every aspect of 620's building and operations.

Additionally, 620 Industries will maintain positive and cooperative relationships with neighboring residents and businesses by providing contact information for managerial-level staff to our neighbors so that 620 Industries can immediately address any issues concerning parking, noise or other potential concerns.



# Community Outreach Meeting Attestation Form

## Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. 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(2) and 501.400(2).

## Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s):
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

a. Date of publication:

b. Name of publication:

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

a. Date notice filed:

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- The type(s) of ME or MTC to be located at the proposed address;
  - Information adequate to demonstrate that the location will be maintained securely;
  - Steps to be taken by the ME or MTC to prevent diversion to minors;
  - A plan by the ME or MTC to positively impact the community; and
  - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

620 Industries, Inc.

Name of applicant's authorized representative:

Signature of applicant's authorized representative:











**Attachment B**

*April 23, 2021*

HOLYOKE CITY CLERK  
536 DWIGHT ST #2  
HOLYOKE, MA 01040

**Re: NOTICE OF A VIRTUAL COMMUNITY OUTREACH MEETING**

Notice is hereby given that a virtual Community Outreach Meeting for proposed cannabis establishments is scheduled for: Thursday, May 6, 2021, at 5:30 P.M., E.D.T.

The purpose of the public meeting is to provide interested parties with an opportunity to receive information and comment on proposed establishments (cultivation, retail, and product manufacturing) to be located at: 620 Beaulieu, Holyoke, MA.

Participants may choose to attend the meeting either online or by telephone. The Virtual Community Outreach Meeting via Zoom is available at the following link: [www.marvincable.com/zoom/](http://www.marvincable.com/zoom/) or via telephone at: +1 (646) 876-9923, using access code: 635 914 1394.

Meeting agenda and materials to be presented will be available electronically 24 hours in advance. To access the agenda and meeting materials, please visit: [www.marvincable.com/sixtwozero/](http://www.marvincable.com/sixtwozero/).

The Public will have an opportunity to ask questions and provide feedback prior to and during the meeting.

Questions can be submitted in advance by e-mailing: [law@marvincable.com](mailto:law@marvincable.com); or, by calling: (413) 268-6500. Please contact us by e-mail or phone with questions about or problems joining the meeting, and for any other assistance.

More details can be found online at: [www.marvincable.com/sixtwozero/](http://www.marvincable.com/sixtwozero/). Again, feel free to contact us with any questions or concerns.

Cordially,



Marvin Cable, Esq.

**Attachment C**

*April 23, 2021*

**Re: NOTICE OF A VIRTUAL COMMUNITY OUTREACH MEETING**

Notice is hereby given that a virtual Community Outreach Meeting for proposed cannabis establishments is scheduled for: Thursday, May 6, 2021, at 5:30 P.M., E.D.T.

The purpose of the public meeting is to provide interested parties with an opportunity to receive information and comment on proposed establishments (cultivation, retail, and product manufacturing) to be located at: 620 Beaulieu, Holyoke, MA.

Participants may choose to attend the meeting either online or by telephone. The Virtual Community Outreach Meeting via Zoom is available at the following link: [www.marvincable.com/zoom/](http://www.marvincable.com/zoom/) or via telephone at: +1 (646) 876-9923, using access code: 635 914 1394.

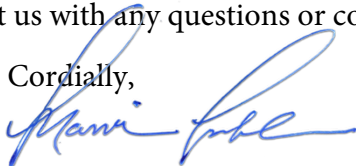
Meeting agenda and materials to be presented will be available electronically 24 hours in advance. To access the agenda and meeting materials, please visit: [www.marvincable.com/sixtwozero/](http://www.marvincable.com/sixtwozero/).

The Public will have an opportunity to ask questions and provide feedback prior to and during the meeting.

Questions can be submitted in advance by e-mailing: [law@marvincable.com](mailto:law@marvincable.com); or, by calling: (413) 268-6500. Please contact us by e-mail or phone with questions about or problems joining the meeting, and for any other assistance.

More details can be found online at: [www.marvincable.com/sixtwozero/](http://www.marvincable.com/sixtwozero/). Again, feel free to contact us with any questions or concerns.

Cordially,



Marvin Cable, Esq.

## **Disclosure of relationship and interest of Marvin Cable.**

---

Marvin Cable, Esq. is counsel for Applicant. Attorney Cable has no ownership in, nor control of Applicant's business. Attorney Cable is paid to provide legal guidance and legal services relating to Applicant's potential Marijuana Establishment.

Marvin Cable, Esq.'s contact information is as follows:

Law Offices of Marvin Cable

P.O. Box 1630

76 Gothic Street

Northampton, MA 01060

law@marvincable.com

+1 (413) 268-6500

# PLAN FOR POSITIVE IMPACT.

---

620 Industries' plan to Positively impact the community is at the core of our mission. We are dedicated to sharing our opportunity with the communities we work in and the people that live in them, particularly the people and communities that have been disproportionately affected by the prohibition and use of drugs. 620 Industries has created the following plan to positively impact the residents of Holyoke, which is identified as an Area of Disproportionate Impact, and Social Equity applicants.

## Goals

620 Industries has established the following goals:

1. Host youth financial literacy programs at least two (2) times per year in Holyoke.
2. Support Social Equity applicants financially.

## Programs

### Youth Financial Literacy Program:

620 Industries' Financial Literacy programs are designed to teach the community's youth about the power of money, savings, spending habits, acquiring assets, credit, and paying bills. We know that many of the youths in our community are unaware of the intricate relationships of these issues, and how such relationships determine what they can acquire, and what they will pay. Without basic information disadvantaged youths from disproportionately impacted areas find themselves with no access to capital which is required to create, build and develop their lives, businesses, and communities. 620 Industries will host these financial literacy programs at least two (2) times annually for Holyoke youth. These programs will take place in the Holyoke Public Library community meeting rooms.

### Social Equity Financial Support Program:

620 Industries will assist at least one Social Equity applicant by providing a low-interest loan or funding through an investment vehicle tailored to the applicant's business circumstances. This financial assistance will be accompanied by mentorship and guidance. Specifically, 620 Industries will solicit applications from Social Equity applicants seeking to form and operate a licensed cannabis business. The application will assess financial need, viability of business plan, and long term goals of the applicant. Social Equity status will be verified. Selection criteria will prioritize applicants that are most in need of financial assistance and mentorship, applicants that will most benefit from this program, and applicants that document a convincing likelihood of success and likelihood of materially benefiting from this program. 620 Industries will choose an applicant by a vote of the Directors. The recipient will be offered either a low-interest loan or a similarly favorable investment instrument, depending on the needs and nature of the recipient's business model. 620 Industries will provide regular mentorship and advice as the applicant develops a business plan, applies for a license, and commences operations.



**Metrics**

620 Industries will execute the above plan and measure the outcomes in the following way:

1. Maintain annual reports describing the date and location of each youth financial literacy program, as well as the number of participants and the information discussed. The report will also detail the manner and methods used to advertise the youth financial literacy program and the proportion of attendees who identified as Holyoke residents.
2. Document in a report the application and selection process of the loan/investment recipient, the terms of the loan/investment, a description of mentoring provided, and a description of the recipient's progress towards licensure. 620 Industries will solicit an evaluation or feedback from the recipient regarding the effectiveness of this program which will be included in the report.

620 Industries will use these metrics to assess its plan and to demonstrate success of the plan upon application for license renewal by submitting documentation of the metrics to the CCC.

**Acknowledgments**

620 Industries will adhere to the requirements set forth in 935 CRM 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Any actions taken, or programs instituted, by 620 Industries will not violate the CCC's regulations with respect to limitations on ownership or control or other applicable state laws.



## 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: 001493376

#### ARTICLE I

The exact name of the corporation is:

620 INDUSTRIES 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:

#### 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 Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CWP	\$100.00000	100,000	\$10,000,000.00	100,000

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:** 3/11/2021 **Time:** 4:00 PM

#### 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: JOHN MUISE  
No. and Street: 620 BEAULIEU ST  
City or Town: HOLYOKE State: MA Zip: 01040 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	KRISTOFER EMMETT CRADDOCK	280 NASSAU ST SPRINGFIELD, MA 01129 USA
TREASURER	JOHN ALFRED MUISE	269 VENTURA ST LUDLOW, MA 01056 USA
SECRETARY	ODALIZ JESUS BRETON	172 BIRCHLAND AVE SPRINGFIELD, MA 01119 USA
VICE PRESIDENT	ODALIZ JESUS BRETON	172 BIRCHLAND AVE SPRINGFIELD, MA 01119 USA
DIRECTOR	KRISTOFER EMMETT CRADDOCK	280 NASSAU ST SPRINGFIELD, MA 01129 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:**

AGRICULTURAL INDUSTRIES

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

No. and Street: 620 BEAULIEAU ST  
City or Town: HOLYOKE State: MA Zip: 01040 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: 620 BEAULIEAU ST

620 BEAULIEAU ST

City or Town: HOLYOKE

State: MA

Zip: 01040

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 10 Day of March, 2021 at 3:33:42 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.)*

JOHN A. MUISE

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:

March 10, 2021 03:29 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

**BYLAWS**  
**OF**  
**620 Industries Inc.,**  
**a Massachusetts Corporation**

**ARTICLE I**

Section 1.1. Annual Meetings. An annual meeting of the shareholders of 620 Industries Inc. (the "Corporation") will be held for the election of directors on a date and at a time and place either within or without the state of Massachusetts fixed by resolution of the Board of Directors and within six months after the end of the fiscal year.

Any other proper business may be transacted at the annual meeting, except as limited by any notice or other requirements under the Massachusetts Business Corporation Act.

Section 1.2. Special Meetings. Special meetings of the shareholders may be called at any time by the holders of shares entitled to cast not less than 10% of the votes at the meeting, such meeting to be held on a date and at a time and place either within or without the Commonwealth of Massachusetts as may be stated in the notice of the meeting.

Section 1.3. Notice of Meetings. Whenever shareholders are required or permitted to take any action at a meeting a written notice of the meeting must be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder entitled to vote thereat, except that meetings to increase the number of shares or corporate indebtedness each require at least 60 days' notice.

Notice of a shareholders' meeting or any report must be given either personally or by first-class mail or other means of written communication, addressed to the shareholder at the address of such shareholder appearing on the books of the Corporation or given by the shareholder to the Corporation for the purpose of notice. The notice shall be deemed to have been given at the time when delivered personally or deposited in the mail or sent by other means of written communication.

Section 1.4. Adjournments. When a shareholders' meeting is adjourned to another time or place, except as otherwise provided in this Section, notice need not be given of any such adjourned meeting if the date, time and place thereof are announced at the meeting at which the adjournment is taken. At the adjourned meeting the Corporation may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 45 days or if after the adjournment a new record date is fixed for the adjourned meeting, a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.5. Validating Meeting of Shareholders; Waiver of Notice. The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. Attendance of a person at a meeting shall constitute a waiver of notice of and presence at such meeting, except when the person objects, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened and except that attendance at a meeting is not a waiver of any right to object to the consideration of matters required by law to be included in the notice but not so included, if such objection is expressly made at the meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, consent to the holding of the meeting or approval of the minutes thereof, except as required by the Massachusetts Business Corporation Act.

Section 1.6. Quorum. A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of the shareholders.

The shareholders present at a duly called or held meeting at which a quorum is present may continue to transact business until adjournment notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum. In the absence of a quorum, any meeting of shareholders may be adjourned from time to time by the vote of a majority of the shares represented either in person or by proxy, but no other business may be transacted, except as provided in this Section.

Section 1.7. Organization. Meetings of shareholders shall be presided over by the Chairman of the Board of Directors, if any, or in the absence of the Chairman of the Board of Directors by the Vice Chairman of the Board of Directors, if any, or in the absence of the Vice Chairman of the Board of Directors by the President, or in the absence of the foregoing persons by a chairman designated by the Board of Directors, or in the absence of such designation by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, shall act as secretary of the meeting, or in their absence the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 1.8. Voting. Unless otherwise provided in the Articles of Organization, each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders.

Any holder of shares entitled to vote on any matter may vote part of the shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal, other than elections to office, but, if the shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Directors shall be elected by a plurality of the votes of the shares present in person or represented by proxy at the meeting and entitled to vote on the election of directors.

In all other matters, unless otherwise provided by Massachusetts law or by the Articles of Organization or these bylaws, the affirmative vote of the holders of a majority of the shares entitled to vote on the subject matter at a meeting in which a quorum is present shall be the act of the shareholders. Where a separate vote by class or classes is required, the affirmative vote of the holders of a majority of the shares of such class or classes at a meeting in which a quorum is present shall be the act of such class or classes, except as otherwise provided by the state of Massachusetts law or by the Articles of Organization or these bylaws.

Section 1.9. Shareholder's Proxies. At all meetings of shareholders, a shareholder may vote by proxy executed in writing by the shareholder or by his or her duly authorized attorney-in-fact.



Such proxy shall be filed with the Secretary of the Corporation before or at the time of the meeting. No proxy shall be valid after the expiration of 11 months from the date thereof unless otherwise provided in the proxy. Every proxy continues in full force and effect until revoked by the person executing it prior to the vote pursuant thereto, except as otherwise provided in this Section. Such revocation may be effected by a writing delivered to the Corporation stating that the proxy is revoked or by a subsequent proxy executed by the person executing the prior proxy and presented to the meeting, or as to any meeting by attendance at such meeting and voting in person by the person executing the proxy.

Section 1.10. Inspectors. In advance of any meeting of shareholders the Board of Directors may appoint inspectors of election to act at the meeting and any adjournment thereof.

Section 1.11. Fixing Date for Determination of Shareholders of Record. In order that the Corporation may determine the shareholders entitled to notice of any meeting or to vote or to express consent to corporate action in writing without a meeting or entitled to receive payment of any dividend or other distribution or allotment of any rights or entitled to exercise any rights in respect of any other lawful action, the Board of Directors may fix, in advance, a record date, which shall not be more than 60 nor less than ten days prior to the date of such meeting nor more than 60 days prior to any other action.

If no record date is fixed:

- a) the record date for determining shareholders entitled to notice of or to vote at a meeting of shareholders shall be at the close of business on the business day next preceding the day on which notice is given or, if notice is waived, at the close of business on the business day next preceding the day on which the meeting is held;
- b) the record date for determining shareholders entitled to give consent to corporate action in writing without a meeting, when no prior action by the Board of Directors has been taken, shall be the day on which the first written consent is given; and
- c) the record date for determining shareholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating thereto or the 60th day prior to the date of such other action, whichever is later. When a determination of shareholders entitled to vote at any meeting of shareholders has been made as provided in this Section, such determination shall apply to any adjournment thereof.

Section 1.12. Consent of Shareholders in Lieu of Meeting. Except as otherwise provided in the Articles of Organization or under the Massachusetts Business Corporation Act, any action that may be taken at any annual or special meeting of the shareholders may be taken without a meeting and without prior notice, if a consent in writing, setting forth the action so taken, shall be signed by the holders of all outstanding shares.

## ARTICLE II

### Board of Directors

Section 2.1. Powers; Number; Qualifications. The business and affairs of the Corporation shall be managed by, and all corporate powers shall be exercised by or under, the direction of the Board of Directors, except as otherwise provided in these bylaws or Articles of Organization.

The number of directors comprising the initial Board of Directors shall be at least three (3). The Board of Directors may be enlarged by the shareholders at any meeting or by vote of a majority of the directors then in office, provided that, the number of directors shall not be less than three whenever the Corporation has three or more shareholders, and shall not be less than two whenever the Corporation has two shareholders.

Section 2.2. Election; Term of Office; Resignation; Vacancies. At each annual meeting of shareholders, directors shall be elected to hold office until the next annual meeting. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which elected and until a successor has been elected and qualified. Any director may resign effective upon giving written notice to the Chairman of the Board of Directors, the Secretary of the Board of Directors, or the Board of Directors of the Corporation, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective.

Subject to the provisions of the Massachusetts Business Corporation Act, any director may be removed with or without cause at any time by the shareholders of the Corporation at a special meeting called for such purpose. In addition, any director may be removed for cause by action of the Board of Directors.

Unless otherwise provided in the Articles of Organization or these bylaws and except for a vacancy caused by the removal of a director, vacancies on the Board of Directors may be filled by appointment by the Board of Directors. The shareholders may elect a director at any time to fill a vacancy not filled by the Board of Directors.

Section 2.3. Regular Meetings. Regular meetings of the Board of Directors may be held without notice at such places within or without the state of Massachusetts and at such times as the Board of Directors may from time to time determine.

Section 2.4. Special Meetings; Notice of Meetings; Waiver of Notice. Special meetings of the Board of Directors may be held at any time or place within or without the state of Massachusetts whenever called by the Chairman of the Board of Directors, by the Vice Chairman of the Board of Directors, if any, or by any two directors. Subject to any greater notice requirements set forth in the Massachusetts Business Corporation Act, special meetings shall be held on five days' notice by mail or 48 hours' notice delivered personally or by telephone, telegraph or any other means of communication authorized by the Massachusetts Business Corporation Act. Notice delivered personally or by telephone may be transmitted to a person at the director's office who can reasonably be expected to deliver such notice promptly to the director.

Notice of a meeting need not be given to any director who signs a waiver of notice or a consent to holding the meeting or an approval of the minutes thereof, whether before or after the meeting, or who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to such director. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. A notice, or waiver of notice, need not specify the purpose of any regular or special meeting of the Board of Directors.

Section 2.5. Participation in Meetings by Conference Telephone Permitted. Members of the Board of Directors, or any committee designated by the Board of Directors, may participate in a meeting of the Board or of such committee, as the case may be, through the use of conference telephone or similar communications equipment permitted by the Massachusetts Business Corporation Act, so long as all members participating in such meeting can hear one another, and participation in a meeting pursuant to this Section shall constitute presence in person at such meeting.

Section 2.6. Quorum; Adjournment; Vote Required for Action. At all meetings of the Board of Directors a majority of the authorized number of directors shall constitute a quorum for the transaction of business. Subject to the provisions of the Massachusetts Business Corporation Act, every act or decision done or made by a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board unless the Articles of Organization or these bylaws shall require a vote of a greater number.

A majority of the directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. If the meeting is adjourned for more than 24 hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the directors who were not present at the time of the adjournment.

Section 2.7. Organization. Meetings of the Board of Directors shall be presided over by the Chairman of the Board of Directors, or in the absence of the Chairman of the Board by the Vice Chairman of the Board of Directors, if any, or in their absence by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, will act as secretary of the meeting, but in the absence of the Secretary and any Assistant Secretary the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 2.8. Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors, or any committee thereof, may be taken without a meeting if all members of the Board or of such committee, as the case may be, shall individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such directors.

Section 2.9. Compensation of Directors. The Board of Directors shall have the authority to fix the compensation of directors for services in any capacity.

### ARTICLE III

#### Executive and Other Committees

Section 3.1. Executive and Other Committees of Directors. The Board of Directors, by resolution adopted by a majority of the authorized number of directors, may designate an executive committee and other committees, each consisting of two or more directors, to serve at the pleasure of the Board of Directors, and each of which, to the extent provided in the resolution but subject to the Massachusetts Business Corporation Act, will have all the authority of the Board.

The Board of Directors may designate one or more directors as alternate members of any such committee, who may replace any absent member or members at any meeting of such committee.

Unless the Board of Directors otherwise provides, each committee designated by the Board may adopt, amend and repeal rules for the conduct of its business. In the absence of a provision by the Board of Directors or a provision in the rules of such committee to the contrary, each committee shall conduct its business in the same manner as the Board of Directors conducts its business pursuant to Article II of these bylaws.

## ARTICLE IV

### Officers

Section 4.1. Officers; Election. As soon as practicable after the annual meeting of shareholders each year, the Board of Directors shall appoint a President, a Treasurer and a Secretary. The Board may also elect one or more Vice Presidents, one or more Assistant Secretaries, and such other officers as the Board may deem desirable or appropriate and may give any of them such further designations or alternate titles as it considers desirable. Any number of offices may be held by the same person.

Section 4.2. Term of Office; Resignation; Removal; Vacancies. Except as otherwise provided in the resolution of the Board of Directors electing any officer, each officer will hold office until his or her successor is elected and qualified or until his or her earlier resignation or removal. Any officer may resign at any time upon written notice to the Board or to the Chairman of the Board or the Secretary of the Corporation. Such resignation will take effect when the notice is delivered, unless the notice specifies a later time, and unless otherwise specified therein no acceptance of such resignation will be necessary to make it effective. The Board may remove any officer with or without cause at any time. Any such removal will be without prejudice to the contractual rights of such officer, if any, with the Corporation, but the election of an officer will not of itself create contractual rights. Any vacancy occurring in any office of the Corporation by death, resignation, removal or otherwise may be filled for the unexpired portion of the term by the Board at any regular or special meeting.

Section 4.3. Powers and Duties. The officers of the Corporation will have such powers and duties in the management of the Corporation as are stated in these bylaws or in a resolution of the Board of Directors that is not inconsistent with these bylaws and, to the extent not so stated, as generally pertain to their respective offices, subject to the control of the Board of Directors. The Secretary will have the duty to record the proceedings of the meetings of the shareholders, the Board of Directors and any committees in a book to be kept for that purpose.

Section 4.4. Salaries. The salaries, compensation and other benefits, if any, of the officers will be fixed from time to time by the Board of Directors, and no officer will be prevented from receiving such salary by reason of the fact that he or she is also a Director of the Corporation.

## ARTICLE V

### Forms of Certificates; Loss and Transfer of Shares

Section 5.1. Forms of Certificates. Every holder of shares in the Corporation is entitled to have a certificate signed in the name of the Corporation by (1) the President, any Vice President, Chairman of the Board or Vice Chairman, and by (2) the Chief Financial Officer, Treasurer, Assistant Treasurer, or Secretary of the Corporation, certifying the number of shares and the class or series of shares owned by such shareholder. If such certificate is manually signed by at least one officer or manually countersigned by a transfer agent or by a registrar, then any other

signature on the certificate may be a facsimile signature. In case any officer, transfer agent or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent or registrar before such certificate is issued, it may be issued by the Corporation with the same effect as if such person were such officer, transfer agent or registrar at the date of issue.

Section 5.2. Lost, Stolen or Destroyed Share Certificates; Issuance of New Certificates. The Corporation may issue a new share certificate or a new certificate for any other security in the place of any certificate theretofore issued by it, alleged to have been lost, stolen or destroyed, and the Corporation may require the owner of the lost, stolen or destroyed certificate, or such owner's legal representative, to give the Corporation a bond sufficient to indemnify it against any claim that may be made against it (including any expense or liability) on account of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

Section 5.3. Uncertificated Shares. Notwithstanding the above, the Corporation may issue uncertificated shares accompanied by information statements which note conspicuously all transfer restrictions applicable to the shares and contain a summary of all rights of each class or series of shares or a statement that the Corporation will furnish this information upon request.

## ARTICLE VI

### Records and Reports

Section 6.1. Shareholder Records. The Corporation shall keep at its principal executive office or at the office of its transfer agent or registrar a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder.

Section 6.2. Corporate Documents and Bylaws. The Corporation shall keep at its principal executive office the original or a copy of the Articles of Organization and bylaws as amended which shall be open to inspection by the shareholders at all reasonable times during office hours. The Corporation shall, upon the written request of any shareholder, furnish to that shareholder a copy of the Articles of Organization or bylaws as amended to date.

Section 6.3. Minutes and Accounting Records. The minutes of proceedings of the shareholders, the Board of Directors, and committees of the Board, and the accounting books and records will be kept at the principal executive office of the Corporation, or at such other place or places as designated by the Board of Directors. The minutes will be kept in written form, and the accounting books and records will be kept either in written form or in a form capable of being converted into written form.

Section 6.4. Inspection by Directors. Subject to applicable Massachusetts law, every director shall have the right at any reasonable time to inspect all books, records, and documents of every kind and the physical properties of the Corporation and each of its subsidiary corporations for purposes relating to his or her status as director. This inspection by a director may be made in person or by an agent or attorney and the right of inspection includes the right to copy and make extracts of documents.

Section 6.5. Annual Report to Shareholders. Subject to the Massachusetts Business Corporation Act, for as long as the Corporation has fewer than the number of shareholders specified in the applicable statute, if any, any requirement of an annual report to shareholders is expressly waived. However, nothing in this provision shall be interpreted as prohibiting the Board of Directors from issuing annual or other periodic reports to the shareholders, as the Board considers appropriate.

At the annual meeting of shareholders, or the meeting held in lieu thereof, the Corporation shall lay before the shareholders a financial statement consisting of:

- a) A balance sheet containing a summary of the assets, liabilities, stated capital, if any, and surplus (showing separately any capital surplus arising from unrealized appreciation of assets, other capital surplus, and earned surplus) of the Corporation as of the end of the Corporation's most recent fiscal year, except that, if consolidated financial statements are laid before the shareholders, the consolidated balance sheet shall show separately or disclose by a note the amount of the consolidated surplus that does not constitute earned surplus of the Corporation or any of its subsidiaries and that is not classified as stated capital or capital surplus on the consolidated balance sheet; and
- b) A statement of profit and loss and surplus, including a summary of profits, dividends or distributions paid, and other changes in the surplus accounts of the Corporation for the period commencing with the date marking the end of the period for which the last preceding statement of profit and loss required under this Section was made and ending with the date of said balance sheet, or in the case of the first statement of profit and loss, from the incorporation of the Corporation to the date of said balance sheet.

Section 6.6. Financial Statements. The Corporation shall keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Corporation on file in the Corporation's principal office for 3 years. These documents shall be exhibited at all reasonable times, or copies provided, to any shareholder on demand.

Section 6.7. Form of Records. Any records maintained by the Corporation in the regular course of its business, with the exception of minutes of the proceedings of the shareholders, and of the Board of Directors and its committees, but including the Corporation's stock ledger and books of account, may be kept on, or be in the form of magnetic tape, photographs, microphotographs or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Corporation shall so convert any records so kept upon the request of any person entitled to inspect the same.

## ARTICLE VII

### Miscellaneous

Section 7.1. Principal Executive or Business Offices. The Board of Directors shall fix the location of the principal executive office of the Corporation at any place either within or without the state of Massachusetts.

Section 7.2. Fiscal Year. The fiscal year of the Corporation must be determined by the Board of Directors.

Section 7.3. Seal. The Corporation may have a corporate seal which shall have the name of the Corporation inscribed thereon and shall be in such form as may be approved from time to time by the Board of Directors. The corporate seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any other manner reproduced.

Section 7.4. Indemnification. The Corporation shall have the power to indemnify, to the maximum extent and in the manner permitted by the Massachusetts Business Corporation Act, each of its directors, officers, employees and agents against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was an agent of the Corporation.

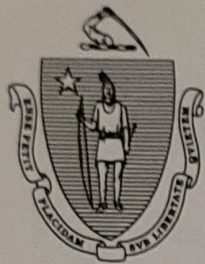
Section 7.5. Contracts. The Board of Directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 7.6. Dividends. The Board of Directors may from time to time declare, and the Corporation may pay dividends on its outstanding shares in the manner and upon the terms and conditions provided by Massachusetts law and its Articles of Organization.

Section 7.7. Amendment of Bylaws. To the extent permitted by law, these bylaws may be amended or repealed, and new bylaws adopted, by the Board of Directors. The shareholders entitled to vote, however, retain the right to adopt additional bylaws and may amend or repeal any bylaw whether or not adopted by them.

Unless otherwise stated in the Articles of Organization, these bylaws may be amended or repealed, and new bylaws adopted, only by action of the shareholders.





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

William Francis Galvin  
Secretary of the  
Commonwealth

April 6, 2021

TO WHOM IT MAY CONCERN:

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

**620 INDUSTRIES INC.**

is a domestic corporation organized on **March 11, 2021**, 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

**Massachusetts Business Information**  
**ATTESTATION OF INABILITY TO OBTAIN CERTIFICATE OF GOOD STANDING**  
**FROM DEPT OF UNEMPLOYMENT ASSISTANCE PRIOR TO HIRING**  
**EMPLOYEES**

**620 Industries, Inc.**

I hereby attest that 620 Industries, Inc. has yet to hire any employees as of May 6, 2021. As such, 620 Industries is unable to register with the Massachusetts Department of Unemployment Assistance in order to provide a Certificate of Good Standing (Compliance).

620 Industries will register with the Department of Unemployment Assistance in order to obtain this documentation upon commencement of hiring employees.

Sincerely,



---

Odaliz Breton  
620 Industries, Inc.  
Director and Person with Direct Authority





Commonwealth of Massachusetts  
Department of Revenue  
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L1909313344  
Notice Date: May 27, 2021  
Case ID: 0-001-186-011



## CERTIFICATE OF GOOD STANDING/TAX COMPLIANCE REQUEST STATUS



MARVIN CABLE  
620 INDUSTRIES INC.  
76 GOTHIC ST  
NORTHAMPTON MA 01060-3018

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

We received your request for a Certificate of Good Standing and/or Tax Compliance for 620 INDUSTRIES INC.. As of the date of this notice, the Commissioner of Revenue is unable to certify whether you are in compliance with your tax obligations under Chapter 62C of the Massachusetts General Laws.

According to our records, you're not registered with the Department of Revenue. As a result, we don't know if you have any outstanding liabilities. We're also unable to determine if you're legally required to file and pay taxes in Massachusetts.

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m.

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

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

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

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

Confirmation Code: px8y5n

Edward W. Coyle, Jr., Chief  
Collections Bureau

## **PLAN TO OBTAIN LIMITED LIABILITY INSURANCE.**

---

620 Industries plans to seek insurance brokers that already have experience with the cannabis industry. This allows us to get a better understanding regarding requirements, premiums and coverage. With the assistance of Gilbert Insurance Agency, we are obtaining quotes for coverage, meeting the Cannabis Control Commission standards and requirements, through Canngen Insurance for general and product liability. These quotes are not binding due to our licensing process, but provide realistic figures to work into our financial projections. We are confident we can secure our insurance requirements, contingent on licensing, and we will ensure that coverage is in effect prior to commencing operations. 620 Industries will meet all insurance requirements set by the Commission and acquire coverage that includes general liability and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence.

# 620 INDUSTRIES, INC.

## BUSINESS PLAN

---

<b>Vision</b>	620 Industries will cultivate and wholesale high-quality, unique, and proprietary strains in our small batch cultivation facility. 620 Industries will focus on consistency of quality, variety of strains, and careful cultivation, harvest, and processing from seed to sale.
<b>Company</b>	Located in Holyoke, MA, 620 Industries is a Massachusetts corporation founded in 2021 seeking to meet the cultivation needs of the maturing MA market, while still operating on a small scale.
<b>Team</b>	Owner, Odaliz Breton, will be leading a team of experienced cultivators, associate growers, harvest and trimming technicians, in concert with a deep bench of savvy and experienced business professionals.
<b>Industry</b>	While growing rapidly, the Massachusetts cannabis market is far from saturated and is need of additional licensed cultivators to supply a growing diversity of product. Massachusetts total gross sales since retailers opened is \$1.55 billion as reported by the CCC. This market is expected to experience continued growth during 620 Industries' startup phase.
<b>Market</b>	620 Industries will cultivate flower that appeals to experienced cannabis consumers seeking variety and quality, as well as novice consumers or the occasional user seeking the highest-quality adult-use cannabis. Based in Holyoke, 620 Industries anticipates state-wide distribution via delivery services and wholesale partners, creating brand-recognition throughout the Commonwealth.
<b>Value Proposition</b>	<p>620 Industries' state-of-the-art facility in Holyoke, the company's master growers and genetics library, and the focus on small batch, high quality flower will set 620 Industries apart from the competition.</p> <p>620 Industries will implement carefully thought-out standard operating procedures and constantly improve its processes to ensure quality and efficiency.</p>

## **PLAN TO RESTRICT ACCESS TO 21 YEARS OF AGE.**

---

As a cultivation facility 620 Industries, Inc. ("620 Industries") will not offer access to the general public. Under no circumstances will an individual under the age of 21 be granted into the premises of the facility. In the event 620 Industries discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). 620 Industries will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1). Pursuant to 935 CMR 500.105(4), 620 Industries will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21. 620 Industries will not engage in any advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. 620 Industries will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, fruit, or sporting-equipment item, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(7), any marketing, advertising and branding materials for public viewing will include a warning stating, "For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana." Pursuant to 935 CMR 500.105(6)(b), 620 Industries packaging for any marijuana or marijuana products will be packaged in child resistant packaging, and will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors. 620 Industries' website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13). No marijuana will be visible from outside the cultivation facility and full perimeter and facility video surveillance will detect and prevent diversion. All access points, such as doors and windows, will be hardened and secured.

# **QUALITY CONTROL AND TESTING PROCEDURES.**

---

## **1. QUALITY CONTROL**

620 Industries, Inc. ("620 Industries") will comply with the following sanitary requirements:

1. Any 620 Industries agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any 620 Industries agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - a. Maintaining adequate personal cleanliness; and
  - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. 620 Industries' hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in 620 Industries' production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. 620 Industries' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. 620 Industries will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. 620 Industries' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. 620 Industries' facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. 620 Industries' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. 620 Industries will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such

surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
11. 620 Industries will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. 620 Industries' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and waste water lines;
13. 620 Industries will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. 620 Industries will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. 620 Industries will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

620 Industries' vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c). 620 Industries will ensure that 620 Industries' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements. 620 Industries will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by 620 Industries to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety. Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

When processing marijuana, 620 Industries will comply with the requirements of 935 CMR 500.105(3) and shall process the leaves and flowers only, and shall ensure that the marijuana is well-cured, free of seeds and stems, free of dirt, sand, debris, and other foreign matter, and free of contamination by mold, rot, fungus, or pests. as



required by 105 CRM 500.00 and, if applicable, 105 CMR 590.000: State Sanitary Code Chapter X. Processing and packaging of marijuana will be done in a secure area on food-grade stainless steel tables, and the agents will not touch the marijuana with their bare hands.

## **2. TESTING**

620 Industries will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Testing of 620 Industries' marijuana products will be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH. Testing of 620 Industries' environmental media will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the DPH, or relevant successor protocols..

620 Industries' policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. Such notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

620Industries will maintain testing results in compliance with 935 CMR 500.000 et seq and the record keeping policies described herein, and will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of 620 Industries' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to 620 Industries for disposal or by the Independent Testing Laboratory disposing of it directly. Any marijuana products with testing dates in excess of one year in the past will be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

Should laboratory results indicate contaminant levels above acceptable limits established in the DPH protocols identified in 935 CMR 500.160, 620 Industries will notify the CCC within 72 hours if such results indicate that the contamination cannot be remediated, and the production batch will be destroyed and disposed of properly, in accordance with 935 CMR 500.105(12). Such a notification will include a proposed plan

for destruction of the product, and assessment of the source of contamination. A failed batch may be submitted for reanalysis pursuant to 935 CMR 500.160(13), but any marijuana that fails the second test may not be sold or transferred without first being remediated. If remediation of contamination is possible, 620 Industries will re-submit a batch sample for testing after remediation efforts have been made. If 620 Industries reasonably believes that a failed test was in error, they may submit a batch sample for re-testing to an ITL other than the laboratory which provided the initial failed result. Any failing marijuana may be remediated a maximum of two times. If the marijuana fails testing after the second remediation, it must be destroyed in compliance with 935 CMR 500.105(12).

Should voluntary or mandatory recalls of marijuana may be made by either 620 Industries or the CCC in order to remove defective, or potentially defective marijuana products from the market in an effort to promote public health and safety, 620 Industries will follow an established set of written policies to effect such a recall. Any outdated, spoiled, damaged, deteriorated, mislabeled or contaminated inventory will be destroyed and disposed of as per 935 CMR 500.105(12).

# PERSONNEL POLICIES AND BACKGROUND CHECKS.

---

## 1. OVERVIEW

620 Industries will securely maintain personnel records, including registration status and background check records. 620 Industries will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent;
- A staffing plan that will demonstrate accessible business hours and safe conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

## 2. AGENT PERSONNEL RECORDS

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with 620 Industries and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed Responsible Vendor Training and eight-hour related duty training; and Results of initial background investigation, including CORI reports.

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent's manager or members of the executive management team.

#### After-Hours Contact Information

Name:

Email:

Phone:

Name:

Email:

Phone:

Business Hours (Subject to Approval by the Special Permit Granting Authority)<sup>1</sup>

Monday - Sunday:

### **3. AGENT BACKGROUND CHECKS**

In addition to completing the Commission's agent registration process, all agents hired to work for 620 Industries will undergo a detailed background investigation prior to being granted access to a 620 Industries facility or beginning work duties, as required under 935 CMR 500.030 and 935 CMR 500.101(1)(b) and in compliance with M.G.L. c. 6 section 172. Such documentation will be maintained within each agent's personnel record.

Background checks will be conducted on all agents in their capacity as employees or volunteers for 620 Industries pursuant to 935 CMR 500.100 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), 620 Industries will consider:

- a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
- b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
- c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.

Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, 620 Industries will:

a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.

b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, 620 Industries will consider the following factors:

- i. Time since the offense or incident;
- ii. Age of the subject at the time of the offense or incident;
- iii. Nature and specific circumstances of the offense or incident;
- iv. Sentence imposed and length, if any, of incarceration, if criminal;
- v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
- vi. Relationship of offense or incident to nature of work to be performed;
- vii. Number of offenses or incidents;
- viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
- ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
- x. Any other relevant information, including information submitted by the subject.

c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.

Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.

References provided by the agent will be verified at the time of hire.

As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by 620 Industries or the Commission.

#### **4. PERSONNEL POLICIES AND TRAINING**

As outlined in 620 Industries' Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All 620 Industries agents are required to complete training as detailed in 620 Industries' Qualifications and Training plan which includes but is not limited to the 620 Industries' strict alcohol, smoke and drug-free workplace policy, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal.

620 Industries will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to 620 Industries operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

## **5. JOB DESCRIPTIONS**

- **Cultivation Manager**
  - Responsible for day-to-day cultivation operations and development and oversight of strategy, policies and procedures.
- **Cultivation Assistant**
  - Under direction of Cultivation Manager, assists in all aspects of cultivation operations.
- **Processing Assistant**
  - Under direction of Cultivation Manager, responsible for drying, trimming, curing and similar duties.
- **Warehouse Manager**
  - Responsible for inventory control and managing incoming and outgoing shipments.
- **Sales & Marketing**
  - Responsible for establishing and maintaining wholesale accounts and sales relationships.
- **Administrative Assistant**
  - Responsible for back office recordkeeping, assists with compliance, and assists management and executives as needed.
- **Executives**
  - Responsible for creation of strategy and policy, hiring, training, disciplinary actions, security policy, finances, compliance, and all other executive-level management.
- **Security**
  - Monitor security systems and cameras, verify identification and authorization of anyone seeking access to the facility, escort visitors, respond to alarms or emergency situations.

# **MAINTENANCE OF FINANCIAL RECORDS POLICY.**

---

620 Industries, Inc.'s ("620 Industries") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
  1. Assets and liabilities;
  2. Monetary transactions;
  3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
  4. Sales records including the quantity, form, and cost of marijuana products;
  5. Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
- All sales recording requirements under 935 CMR 500.140(6) are followed, including:
  1. Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
  2. Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
  3. Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
  4. Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
  5. Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500;
  6. If colocated with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this



application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

- Additional written business records will be kept, including, but not limited to, records of:
  1. Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
  2. Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations;
  3. Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.
  4. Local, state and federal tax payments.

All financial records shall be retained for a minimum of two years following closure of the business and shall be accessible to the CCC as per 935 CMR 500(105)(9)(g).

## **QUALIFICATIONS AND INTENDED TRAINING.**

---

620 Industries will ensure that all employees hired to work at a 620 Industries facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

### **Qualifications**

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

620 Industries will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that 620 Industries discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and 620 Industries will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

### **Training**

As required by 935 CMR 500.105(2), and prior to performing job functions, each of 620 Industries' agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

All of 620 Industries' current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. 620 Industries' new, nonadministrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. 620 Industries' owners, managers, and employees will then successfully complete the program once every year thereafter. 620 Industries will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. 620 Industries' records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, 620 Industries' agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

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

# 1. ENERGY COMPLIANCE PLAN

Energy and resource conservation are important philosophical missions to 620 Industries. 620 Industries will adopt and use best management practices as determined by the CCC to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide report such energy usage to the CCC as required. The procedures listed below are a part of the Energy and Resource Conservation practices 620 Industries plans to implement.

620 Industries is committed to identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities, pursuant to *935 CMR 500.105(15)*.

In controlled environment agriculture, particularly for indoor cannabis growth, large amounts of energy are required. To comply with *935 CMR 500.120(11)* 620 Industries intends to purchase LED's that are on the DesignLights Consortium Horticultural Qualified Products List ("DLC list"). Horticulture Lighting Power Density must not exceed 36 watts per square foot. To ensure that energy usage does not exceed this threshold, 620 Industries will monitor energy consumption and regularly assess the effectiveness of operational changes in reducing energy consumption.

- Additionally, as 620 Industries engages in renovations, expansions, or upgrades, or replaces or repairs equipment, 620 Industries will actively identify opportunities to implement energy efficiency measures.
- 620 Industries will identify energy saving opportunities when equipment fails or needs replacement.
- Regardless, 620 Industries will satisfy minimum energy efficiency standards established by the CCC and shall comply with all applicable environmental laws, regulations, and permits.

620 Industries will consider opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable, as per *935 CMR 500.105(15)*. 620 Industries will:

- Make energy supply decisions and regularly evaluate renewable options based on the available options for renewable energy;
- Identify renewable or alternative energy opportunities as part of any facility upgrades, renovations, or expansions;
- and Identify renewable or alternative energy opportunities when equipment fails or needs to be replaced.

- 620 Industries will actually be using only renewable energy. The facility we are seeking licensing for is in Holyoke Massachusetts where the local electrical utility only provides hydroelectric power from the Holyoke dam which crosses the Connecticut River. Over time, 620 Industries may install photovoltaics on the roof or invest in a community solar project.
- 620 Industries will also consider opportunities for renewable energy generation whenever it repairs or replaces equipment, or engages in facility expansion or renovations

620 Industries will employ strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage), in compliance with 935 CMR 500.105(15). 620 Industries will:

- Monitor energy demand and make adjustments to operations based on usage data;
- Participate in load curtailment, energy storage, or other active demand management programs to the extent applicable to our operations.

620 Industries will engage with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. 935 CMR 500.105(15). 620 Industries will utilize the MassSave programs which offer energy assessments and incentives to upgrade to energy-saving equipment and systems. The MassSave Sponsor for 620 Industries is the Holyoke Gas & Electric Company. 620 Industries will request the Sponsor's assistance in auditing energy usage and identifying ways to save energy, including updating or retrofitting equipment, and controlling equipment for occupancy changes throughout the day.

620 Industries will ensure on a regular basis that equipment is maintained, calibrated, and operating properly. Including, but not limited to, maintaining operations manuals and operating procedures for all major energy-using equipment, such as horticultural lighting, HVAC systems, and dehumidification systems.

Prior to final licensure, 620 Industries will have a Massachusetts licensed engineer or architect write a letter documenting energy compliance, and will also submit supporting documentation and building plans, as per 935 CMR 500.120(11). A licensed mechanical engineer will prepare and sign a letter regarding the HVAC and dehumidification systems. All lighting products will be safety- certified by an appropriate third-party. Upon applying for license renewal, 620 Industries will include a report of energy and water use over the preceding 12-month period, in compliance with 935 CMR 500.120(11).

# **RECORD KEEPING POLICIES.**

---

## General Overview

620 Industries, Inc. ("620 Industries") has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of 620 Industries documents. Records will be stored at 620 Industries in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

## Recordkeeping

To ensure that 620 Industries is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of 620 Industries' quarter-end closing procedures. In addition, 620 Industries' operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

Corporate Records: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

1. Insurance Coverage:
  - Directors & Officers Policy
  - Product Liability Policy
  - General Liability Policy
  - Umbrella Policy
  - Workers Compensation Policy
  - Employer Professional Liability Policy
2. Third-Party Contracts
3. Commission Requirements:
  - Annual Agent Registration and training
  - Annual Marijuana Establishment Registration
4. Local Compliance:
  - Certificate of Occupancy
  - Special Permits
  - Variances
  - Site Plan Approvals
  - As-Built Drawings

5. Corporate Governance:
  - Annual Report
  - Secretary of State Filings

Business Records:

Records that require ongoing maintenance and updates. These records will be prepared in accordance with Generally Accepted Accounting Principles (GAAP), and can be electronic or hard copy (preferably electronic) and at minimum include:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products;
5. Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with 620 Industries, including members, if any.

Personnel Records: At a minimum will include:

1. Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with 620 Industries and will include, at a minimum, the following:
  - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - Documentation of verification of references;
  - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
  - Documentation of periodic performance evaluations; and

- A record of any disciplinary action taken.
  - Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  4. Personnel policies and procedures, including a Code of Ethics, as Whistleblower policy, and a policy which notifies persons with disabilities of their rights and includes provisions prohibiting discrimination and providing reasonable accommodation;
  5. All background check reports obtained in accordance with 935 CMR 500.030; and
  6. Pursuant to 803 CMR 2.04: iCORI Registration, shall retain a Criminal Offender Record Information (CORI) report and any other background check information required by the CCC.

#### Handling and Testing of Marijuana Records

1. 620 Industries will maintain the results of all testing for a minimum of one (1) year.

#### Inventory Records

1. Inventory Records shall be kept as required by 935 CMR 500.105(1). *935 CMR 500.105(9)*.

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.

#### Seed-to-Sale Tracking Records

1. Seed-to-sale tracking records shall be kept for all marijuana as required by 935 CMR 500.105(8)(e). *935 CMR 500.105(9)*

620 Industries will use Metrc to maintain real-time inventory. Metrc inventory reporting meets the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all



damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

2. Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

#### Incident Reporting Records

1. Within ten (10) calendar days, 620 Industries will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by 620 Industries for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

#### Visitor Records

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

#### Waste Disposal Records

1. When marijuana or marijuana products are disposed of, 620 Industries will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two 620 Industries agents present during the disposal or handling, with their signatures, in compliance with 935 CMR 500.105(12). 620 Industries will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

#### Security Records

1. A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.

2. Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days.
3. Security system recordings will be maintained in a secure location to prevent loss, theft, alteration, or destruction.
4. A copy of all security plans and procedures to be shared with law enforcement.

#### Transportation Records

1. 620 Industries will retain all shipping manifests for a minimum of one (1) year and make them available to the Commission upon request.

#### Agent Training Records

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

#### Closure

1. In the event 620Industries closes, all records will be kept for at least two (2) years at 620 Industries' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, 620 Industries will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

#### Written Operating Policies and Procedures

Policies and Procedures related to 620 Industries' operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. 620 Industries shall maintain Written Operating Procedures as required by 935 CMR 500.105(1). 935 CMR 500.105(9).

Policies and Procedures will include the following:

1. Security measures in compliance with 935 CMR 500.110;

2. Agent security policies, including personal safety and crime prevention techniques;
3. A description of 620 Industries' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
4. Storage of marijuana in compliance with 935 CMR 500.105(11);
5. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be dispensed;
6. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
7. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160, and retention of laboratory testing results;
8. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
9. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
10. Alcohol, smoke, and drug-free workplace policies;
11. A plan describing how confidential information will be maintained;
12. Policy for the immediate dismissal of any dispensary agent who has:
  - Diverted marijuana, which will be reported the Police Department and to the Commission;
  - Engaged in unsafe practices with regard to 620 Industries operations, which will be reported to the Commission; or
  - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
13. A list of all executives of 620 Industries, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirements may be fulfilled by placing this information on 620 Industries' website.

14. Policies and procedures for the handling of cash on 620 Industries premises including but not limited to storage, collection frequency and transport to financial institution(s).

15. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

16. Policies and procedures for energy efficiency and conservation that will include:

- Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
- Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.

17. Policies and procedures to promote workplace safety consistent with OSHA standards, including plans to identify and address any biological, chemical, or physical hazards, including a hazard communication plan, personal protective equipment assessment, fire protection plan, and an emergency action plan.

Record-Retention 620 Industries will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

Deficiency Statements: After an inspection in which a violation is observed or determined to have occurred, the CCC deficiency statement citing every violation will be retained by 620 Industries for no less than two (2) years.

## DIVERSITY PLAN.

---

620 Industries, Inc. ("620 Industries") believes in creating and sustaining a robust policy of inclusivity and diversity. 620 Industries recognizes that diversity in the workforce is key to the integrity of a company's commitment to its community. 620 Industries is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following: minorities; women; veterans; people with disabilities; and people who identify as LGBTQ+.

To support such populations, 620 Industries has created the following Diversity Plan and has identified and created goals and programs to promote equity in 620 Industries' operations.

### Goals

1. Promote equity by hiring and retaining diverse individuals for at least 35% of our workforce, which will consist of 65% minority, 10% women, 15% veterans, 5% individuals with disabilities and 5% individuals who identify as LGBTQ+.
2. Source 40% of all contracts to diverse vendors and use best efforts to ensure the company maintains the following diversity percentages: 65% minority, 10% women, 15% veterans, 5% individuals with disabilities and 5% individuals who identify as LGBTQ+.

### Program

620 Industries will accomplish this goal through the following actions:

#### Hiring:

- Advertising employment opportunities and career fairs in diverse publications or other mediums, including bilingual newspapers/platforms, networking groups for minorities and posting job options on public boards. Such publications may include El Sol Latino, Holyoke Sun, Daily Hampshire Gazette, Valley Advocate, and ads will encourage applications from diverse/minority/bilingual/female/disabled/LGBTQ+ candidates. At least one (1) advertisement will occur whenever a job becomes available;
- Encouraging current 620 Industries employees from diverse groups to refer applicants for employment;
- Participating in career day programs, such as those offered by MassHire Holyoke Career Center, at least once per year.

#### Contracts:

- Utilize the Supplier Diversity Office directory of certified diverse businesses to identify potential contractors/vendors/wholesalers.
- Train managers on contracting with diverse businesses.
-

## Metrics and Reporting

The Board of Directors at 620 Industries will be responsible for auditing the Diversity Plan annually prior to license renewal. The audit report setting forth the Company's performance in fulfilling the goals of the Plan will contain:

### Hiring:

- Employment data, including information on representation in the workforce in all job classifications; average salary ranges; recruitment and training information; and retention and outreach efforts;
- A comprehensive description of all efforts made by 620 Industries to deploy, monitor and enforce the Diversity Plan;
- Number of diverse individuals who were hired and retained after the issuance of a license;
- Number of promotions for diverse individuals since initial licensure;
- Number of total positions created since initial licensure;
- Number of and type job postings and recruitment efforts with supporting documentation.

### Contracting:

- Contracting data, including information on the number and type of businesses contracted with; the nature of the business relationship (i.e., service provider, supplier, vendor, wholesale partner, etc.).
- Methods used for identifying diverse suppliers.
- Percentages of total contracting relationships constituted by diverse businesses.

## Acknowledgments

- 620 Industries 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.
- Any actions taken, or programs instituted, by 620 Industries will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.