Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC283899

Original Issued Date: 04/24/2024

Issued Date: 04/24/2024

Expiration Date: 04/24/2025

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: 686 Cultivation LLC

Phone Number: 978-423-7820

Email Address: derbysauto@yahoo.com

Business Address 1: 686 Clark Rd

Business Address 2:

Business City: Tewksbury

Business State: MA

Business Zip Code: 01876

Mailing Address 1: 686 Clark Rd

Mailing Address 2:

Mailing City: Tewksbury

Mailing State: MA

Mailing Zip Code: 01876

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: 50

Percentage Of Control: 50

Role: Owner / Partner

Other Role:

First Name: Jeffrey **Last Name:** Derby **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 50 **Percentage Of Control:** 50

Role: Owner / Partner **Other Role:**

First Name: Michael **Last Name:** Saccone **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

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

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 686 Clark Road

Establishment Address 2:

Establishment City: Tewksbury **Establishment Zip Code:** 01876

Approximate square footage of the Establishment: 6284 **How many abutters does this property have?:** 49

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 02: 5,001 to 10,000 sq. ft. **Cultivation Environment:** Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	686 - Plan to Remain Compliant with Local Zoning.pdf	pdf	658313918a09310008da8646	12/20/2023
Certification of Host	doc09702220240110132459.pdf	pdf	65a03887fa86d00008d0d241	01/11/2024

Community Agreement				
Community Outreach Meeting Documentation	686 Cultivation, LLC - Community Outreach Form - for signature[18].pdf	pdf	65ba604a7252ab000884772b	01/31/2024
Community Outreach Meeting Documentation	Proof of Approval for Virtual Meeting.pdf	pdf	65ba627258452f0008a54741	01/31/2024

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.: $

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	686 Cult - PIP - RFI.pdf	pdf	65b9266958452f0008a41984	01/30/2024

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:**

First Name: Jeffrey **Last Name:** Derby **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner **Other Role:**

First Name: Michael **Last Name:** Saccone **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	686 AOI.pdf	pdf	65831935e728640008af030b	12/20/2023
Department of Unemployment Assistance - Certificate of Good standing	686 DUA Attestation.pdf	pdf	658319f18a09310008da931d	12/20/2023
Secretary of Commonwealth - Certificate of Good Standing	Scanned from a Xerox Multifunction Printer[12].pdf	pdf	65a03e11fa86d00008d0e6e9	01/11/2024
Bylaws	2024.02.13_686 Cultivation - Operating Agreement - signed.pdf	pdf	65cbdbc94e4a6100071c6447	02/13/2024
Department of Revenue -	doc09966720240212105957.pdf	pdf	65cbdbf6f8aae300097a2978	02/13/2024

Certificate of Good standing

No documents uploaded

Massachusetts Business Identification Number: 001717385

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	686 Cult - Cultivation Timeline.pdf	pdf	65831c05e728640008af0952	12/20/2023
Plan for Liability Insurance	686 - Liability Insurance.pdf	pdf	65831c92e728640008af0ac3	12/20/2023
Business Plan	686 - Business Plan.pdf	pdf	65831eec8a09310008da9b17	12/20/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	686 - Security.pdf	pdf	65831fcc8a09310008da9c37	12/20/2023
Personnel policies including background checks	686 - Personnel.pdf	pdf	65831fd1e728640008af0d64	12/20/2023
Restricting Access to age 21 and older	686 - Restricting Access.pdf	pdf	65831fe08a09310008da9c82	12/20/2023
Prevention of diversion	686 - Diversion.pdf	pdf	65831fe3e728640008af0d92	12/20/2023
Storage of marijuana	686 - Storage.pdf	pdf	658320f6e728640008af0ed7	12/20/2023
Inventory procedures	686 - Inventory.pdf	pdf	658320fc8a09310008da9dec	12/20/2023
Transportation of marijuana	686 - Transportation.pdf	pdf	65832100e728640008af0ef5	12/20/2023
Quality control and testing	686 - Quality Control.pdf	pdf	65832136e728640008af0fbc	12/20/2023
Record Keeping procedures	686 - Recordkeeping.pdf	pdf	658321ae8a09310008daa02b	12/20/2023
Maintaining of financial records	686 - Financial Records.pdf	pdf	658321b78a09310008daa091	12/20/2023
Qualifications and training	686 - Qualification.pdf	pdf	658321bf8a09310008daa136	12/20/2023
Policies and Procedures for cultivating.	686 - Cultivating.pdf	pdf	65832207e728640008af11a2	12/20/2023
Energy Compliance Plan	686 - Energy (Cult).pdf	pdf	65832393e728640008af14e9	12/20/2023
Diversity plan	686 - Diversity Plan.pdf	pdf	658328ce8a09310008dab0ac	12/20/2023

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

Notifcation:

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 6:00 PM
Tuesday From: 9:00 AM	Tuesday To: 6:00 PM
Wednesday From: 9:00 AM	Wednesday To: 6:00 PM
Thursday From: 9:00 AM	Thursday To: 6:00 PM
Friday From: 9:00 AM	Friday To: 6:00 PM
Saturday From: 9:00 AM	Saturday To: 6:00 PM
Sunday From: 9:00 AM	Sunday To: 6:00 PM

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

686 Cultivation LLC ("686 Cultivation") will remain compliant at all times with the local zoning requirements set forth in the Town of Tewksbury's Bylaw. The Property is located within the Industrial-1 Zone. As such, pursuant to Tewksbury Zoning Bylaw §5.4.3 (Appendix A), the Proposed Use is permissible subject to the issuance of a Special Permit from the Planning Board. 686 Cultivation has received its Special Permit.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12.

686 Cultivation will apply for any other local permits required to operate at the proposed location, which will include a Building Permit and a Certificate of Occupancy. 686 Cultivation will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Establishment at 686 Cultivation's proposed location.

686 Cultivation has already attended several meetings with various municipal officials and boards to discuss 686 Cultivation's plans and has executed a Host Community Agreement with Tewksbury. 686 Cultivation will continue to work cooperatively with various municipal departments, boards, and officials to ensure that 686 Cultivation's facility remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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:

   686 Cultivation LLC

2. Name of applicant's authorized representative:

   Jeff Derby

3. Signature of applicant's authorized representative:

4. Name of municipality:

   Town of Tewksbury

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

   Richard A. Montuori

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).)*:

   rmontuori@tewksbury-ma.gov

8. Host community agreement execution date:

   12/19/23

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

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): 1/17/2024

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: 1/3/24

    b. Name of publication: Town Crier

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: 12/27/23

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: 12/27/23

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
    a. The type(s) of ME or MTC to be located at the proposed address;
    b. Information adequate to demonstrate that the location will be maintained securely;
    c. Steps to be taken by the ME or MTC to prevent diversion to minors;
    d. A plan by the ME or MTC to positively impact the community; and
    e. 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:

686 Cultivation, LLC

Name of applicant's authorized representative:

Jeffrey T. Derby

Signature of applicant's authorized representative:

Jeffrey T Derby

https://us02web.zoom.us/rec/share/
HI6KgO3Ab3dMfHL25aGAYVJ4A6VYctYjPMak7IlthjBAVOOtjqNUhncul4uVK5Rf.Ohe8Fo6sUEE0agzD
Passcode: E4=Nc9B?

There were 5 attendees.

Attachment A

OBITUARY

Donald G. Day

Served four years in the U.S Navy

Donald G. Day of Tewksbury and Marco Island, FL, aged 74, passed away unexpectedly on Dec. 27, 2023.

He was born in Montgomery, WV, on April 29, 1949, the son of the late Barbara (Nolter) and Gerald Day.

Don spent his early years living in Lunenburg before moving to Billerica late in his teen years, graduating from Billerica Memorial High School with the class of 1967. As a child he loved all sports, especially playing football and baseball.

Upon returning from four years of service in the United States Navy, he settled in Billerica with his first wife and two daughters and began a career in property management.

In July 1981, he met his true love and soulmate Maria Gallazzo, and they were married on Nov. 5, 1983. They settled in Woburn and lived there for almost 30 years, raising their three children. In those years, Don and Maria created a beautiful and loving home, working through numerous renovations and fanatically tending to their yard and garden. There wasn't a day that didn't start and end with a cup of coffee.

In his retirement years, Don followed the warm weather, enjoying the winter months in Marco Island with Maria and an abundance of friends. He loved spending days on the beach, Monday night Bingo, and the Friday Fish Fry at Residents' Beach. With unlimited time in Tewksbury during the summer months, he kept busy tending to his vegetable garden and watching for hummingbirds. He was a loyal fan of all Boston sports, especially the Patriots and Celtics.

Don was diagnosed in 2016 with Inclusion Body Myositis, a condition causing muscle weakness and irreparable muscle damage. While this slowed him down a bit, it did not stop him and he could still be found supporting and cheering on his grandchildren at their many activities, and he was always the center of attention at a family gathering or party with friends.

In addition to his wife, Don is lovingly survived by his five children, Jennifer Couillard and her husband Charles, of Tewksbury, Rebecca Carroll and her husband, Matthew, of Wesford, Diana DeMonico and her husband, Christopher of Sandown, NH, Dawn Cossette and her wife, Kaylin, of Tewksbury, and Christopher Day of Burlington.

He adored his 11 grandchildren, Christopher London, Alison and Gabrielle Couillard, Madelyn, Grace, Katie and Quinn Carroll, Caylee and Christopher DeMonico, Natalie Martin, and Nathan Day.

In addition, he was eagerly anticipating the April 2024 arrival of another grandson, Logan Cossette.

He leaves two sisters, Donna Brunas and her husband, Ken, of Canaan, NH, and Elida Day of Summerfield, FL, a brother in law, Peter Gallazzo, and his husband, Kevin Moriarty, as well as three nieces and a nephew.

He was blessed to be surrounded in love and will be greatly missed by so many others.

Friends and relatives were invited to calling hours on Tuesday, Jan. 2 from 4-7 p.m. at the Carrier Family Funeral Home, 58 Range Road, Windham, NH. Funeral services were held Wednesday, Jan. 3 at 11 a.m. at the funeral home. Cremation will follow.

In lieu of flowers, donations may be made in Don's memory to Myositis Support and Understanding at *www.understandingmyositis.org*. In the months and years following his diagnosis, Don found a great deal of support and compassion here, and he was able to connect with others living with this rare condition.

For directions or to send a message of condolence to the family, please visit *www.carrierfuneralhome.com*

2023 Board of Health Year in Review

By ROSALYN IMPINK
News Correspondent

TEWKSBURY — In 2023, the Tewksbury Board of Health addressed several pressing public health issues in the community. Here are some of the highlights.

In January, the board discussed draft tobacco control regulations to be incorporated into the town's regulations to mirror the state statute updated in 2019. Tobacco agent Ron Beauregard offered recommendations on bringing the town's tobacco regulations in line with state rules, including updating the penalty structure for repeated violations.

February brought a presentation from the town's hoarding task force. Town nurse Ashley Pavlakos and Christina Hess, outreach coordinator for the Tewksbury Senior Center, presented slides as part of their discussion with the board regarding the topic. Tewksbury is part of a nine community hoarding resource group. Help is available by reaching out to the Health Department.

In March, the town went live on OpenGov, a cloud-based permitting workflow allowing residents to apply and pay for permits online.

In April, the makeup of the board turned over in the only contested race of the annual town election. Member Charles Roux declined to run for reelection. Kathryn Bugda Gwili defeated former board member George Ferdinand, with Bugda Gwili receiving 565 votes while Ferdinand received 208 votes.

Over the summer, the board met to address repeated food code violations by Jade K, at 432 Main St. The restaurant had been closed for several months due to "unsanitary conditions." The restaurant engaged a food consultant and later received clearance from the health department to reopen.

The department also worked with Lazza to reopen after renovations and food safety updates after being closed for health violations.

Chair Ray Barry raised the topic of creating two working groups, one for body art regulations and one for letter grading for food establishments. Health Director Shannon Gillis expressed concern about the capacity of staff to fairly manage such a program.

September's meeting brought a hearing on a tobacco sale to minors violation that resulted in a $1,000 fine. Member Robert Scarano discussed the problem of youth smoking, stating it is a billion dollar industry and that smoking can be a gateway to lifelong addiction.

The board also addressed the resolution of an ongoing keeping of animals issue at 175 Kendall Road that resulted in the removal of several rabbits.

Later in the fall, public health nurse Ashley Pavlakos held several training courses for residents, including a youth mental health first aid course.

The department administered regular and high dose flu vaccines to residents and hosted the Dana Farber Mammography Van at the Senior Center.

Barry also returned to the topic of updating body art regulations, noting that skin training and hygiene practices should be reviewed as the state leaves regulations up to each municipality.

The board closed out the year by reviewing the 2024 permit fee schedule and making no changes. Fees are collected by the health department for permits and inspections for a variety of locations and reasons including food establishments, public swimming pools, hotels, wood boilers, body art practitioners, the keeping of certain animals, among other activities.

Ron Beauregard addressed the board regarding a potential cap on retail tobacco sales permits for retail tobacco stores. The cap would be for stores that sell tobacco only. Beauregard explained that preliminary numbers show Tewksbury has a slightly higher retail density of tobacco per 1,000 youth than surrounding communities.

Barry and member Rob Scarano both announced they will not be running for reelection in the spring. Residents interested in filling positions on the Board of Health can pull nomination papers at town hall starting on Jan. 2, 2024. Barry said no specific knowledge of public health is required.

The town election will be held Saturday, April 6, 2024.

The next meeting is scheduled for Jan. 19, 2023. Residents may find the meeting agenda on the town website. The meeting may be viewed on Comcast channel 99 and Verizon channel 33.

Camplese completes intensive research project

WORCESTER — Ethan Camplese, resident of Tewksbury, a member of the class of 2025 majoring in Architectural Engineering at Worcester Polytechnic Institute (WPI), was a member of a student team that recently completed an intense research project titled Signage and Information System to Protect the Alpine Zone.

At WPI, all undergraduates are required to complete a research-driven, professional-level project that applies science and technology that addresses an important societal need or issue. About two-thirds of students complete a project at one of the university's 50-plus off-campus project centers, which are located around the world. A signature element of the innovative undergraduate experience at WPI, the project-based curriculum offers students the opportunity to apply their scientific and technical knowledge to develop thoughtful solutions to real problems that affect the quality of people's lives and make a difference before they graduate.

"The WPI project-based curriculum's focus on global studies brings students out of the classroom and their comfort zones and into the global community to apply their knowledge and to solve problems," said Professor Kent Rissmiller, professor of Integrative & Global Studies and associate dean of The Global School. "Students are immersed in all aspects of a different culture, from the way people live and work to the values they hold to the foods they eat — all valuable perspectives for surviving and thriving in today's global marketplace. They also learn the meaning and magic of teamwork, make a real and meaningful difference in their host community; and gain a competitive edge for any resume, or graduate or professional school application."

About Worcester Polytechnic Institute

WPI, a global leader in project-based learning, is a distinctive, top-tier technological university founded in 1865 on the principle that students learn most effectively by applying the theory learned in the classroom to the practice of solving real-world problems.

Recognized by the National Academy of Engineering with the 2016 Bernard M. Gordon Prize for Innovation in Engineering and Technology Education, WPI's pioneering project-based curriculum engages undergraduates in solving important scientific, technological, and societal problems throughout their education and at more than 50 project centers around the world.

WPI offers more than 70 bachelor's, master's, and doctoral degree programs across 14 academic departments in science, engineering, technology, business, the social sciences, and the humanities and arts. Its faculty and students pursue groundbreaking research focused on ongoing challenges in health and biotechnology, robotics and the internet of things, advanced materials and manufacturing, cyber, data, and security systems, learning science, and more.

www.wpi.edu

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• Chain Link
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WILMINGTON 978-657-5410
WOBURN 781-935-1234
605 Woburn Street, Wilmington
Over 25 years in business

Explaining the trails

In 2023, Tewksbury's Open Space and Recreation Plan Committee continued installing interpretive signs for the town's conservation properties and trails. The panels include details about the plants, animals, and history of the properties. (Paige Impink photo)

Attachment B

From: Rebecca Rutenberg
To: dgraffeo@tewksbury-ma.gov
Cc: Bridgette Nikisher
Subject: Public Meeting Notice
Date: Wednesday, December 27, 2023 10:05:47 AM
Attachments: image001.png
686 Cultivation, LLC - Notice of Community Outreach Meeting[15][26].docx

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Good morning,

Please find the attached public meeting notice on behalf of 686 Cultivation LLC. Should any additional information be required, please don't hesitate to contact me directly.

Becca

Becca Rutenberg
Vice President, Eastern Markets + Business Intelligence

Vicente

Prudential Tower
800 Boylston Street, 26th Floor
Boston, MA 02199
cell: 610.675.5958

Serving clients from offices nationwide

Attachment B

NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that 686 Cultivation LLC will hold a Virtual Community Outreach Meeting on **January 17, 2024** at 5:30 PM to discuss the proposed siting of an Adult Use Cannabis Cultivation and Product Manufacturing facility at 686 Clark Rd, Tewksbury MA 01876.

This Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 *et seq*. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by emailing r.rutenberg@vicentellp.com.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing r.rutenberg@vicentellp.com or asked during the meeting.

Join Zoom Meeting: https://us02web.zoom.us/j/85970540760
Telephone Dial In: +1 646 558 8656 | Webinar ID: 859 7054 0760#

Attachment C

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
54 BURNHAM ST
BELMONT, MA 02478

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST UNIT 210
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST UNIT C1
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
OAK ST
STONEHAM, MA 02180

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
14 ROSEMARY RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
662 CLARK RD
TEWKSBURY, MA 01876

tenberg
St, 26th Floor
2199

[redacted]
21 LENNY LANE
HUDSON, NH 03051

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST STE 106-108
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
61 FOSS RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
48 COONEY RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
662 CLARK RD STE 15
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
CLARK RD STE 2
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
HAVERHILL, MA 01832

Attachment C

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
59 TRULL RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST U101
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
10 BLUE SPRUCE LANE
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
40 ROSEMARY RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST UNIT G9
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
3 KIMBERLY CT
CHELMSFORD, MA 01824

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
42 WINDWARD RD
LOWELL, MA 01852

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
58 TRULL RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
PO BOX 341
WEST BOXFORD, MA 01885

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
0045 TRULL ROAD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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170 MAIN ST U0G3
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
216 OLD MAIN ST
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
178 GREAT ROAD
ACTON, MA 01720

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
229 SHORE DR
SALEM, NH 03079

Attachment C

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Boston, MA 02199

[redacted]

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
170 MAIN ST UNIT 211
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
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Boston, MA 02199

[redacted]
662 CLARK RD UNIT 13
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
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Boston, MA 02199

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56 TRULL RD
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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170 MAIN ST UNIT 205
TEWKSBURY, MA 01876

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c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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[redacted] CLARK RD
TEWKSBURY, MA 01876

Vicente LLP
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800 Boylston St, 26th Floor
Boston, MA 02199

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170 MAIN ST UNIT 211
TEWKSBURY, MA 01876

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Boston, MA 02199

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11 TRULL RD
TEWKSBURY, MA 01876

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Boston, MA 02199

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Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

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TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
CHELMSFORD, MA 01824

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
[redacted]
LOWELL, MA 01853

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
[redacted] ST 0210
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
860 MAIN ST
LYNNFIELD, MA 01940

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
150 MAIN ST
TEWKSBURY, MA 01876

Vicente LLP
c/o Becca Rutenberg
800 Boylston St, 26th Floor
Boston, MA 02199

[redacted]
54 TRULL RD
TEWKSBURY, MA 01876

Attachment C

NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that 686 Cultivation LLC will hold a Virtual Community Outreach Meeting on **January 17, 2024** at 5:30 PM to discuss the proposed siting of an Adult Use Cannabis Cultivation and Product Manufacturing facility at 686 Clark Rd, Tewksbury MA 01876.

This Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 *et seq*. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by emailing r.rutenberg@vicentellp.com.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing r.rutenberg@vicentellp.com or asked during the meeting.

Join Zoom Meeting: https://us02web.zoom.us/j/85970540760
Telephone Dial In: +1 646 558 8656 | Webinar ID: 859 7054 0760#

Subject: RE: Question re: Community Outreach Meetings
Date: Tuesday, December 26, 2023 at 3:38:55 PM Eastern Standard Time
From: Kyle Potvin
To: Rebecca Rutenberg
CC: Tim Callahan, Tsuko Defoe, Anne DiMare, Derek Chamberlin, Jaime Wakefield
Attachments: image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, external.png

External email

Rebecca,

If it is already scheduled, and is otherwise in compliance with the requirements of a COM, we will honor it.

Thank you,

Kyle Potvin, Esq., *Director of Licensing*
Pronouns: He/Him
Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604
(O) 774.415.0459
Kyle.Potvin@CCCMass.com
www.MassCannabisControl.com

Considering applying for a Marijuana Establishment or Medical Marijuana Treatment Center license? This is a great place to start: Guidance on Licensure.

Please consider all email communications sent to or received by the Cannabis Control Commission (Commission) to be a matter of public record. Commission emails may be disclosed in response to a request made pursuant to the Public Records Law, G. L. c. 66, §10 and G. L. c. 4, § 7, cl. 26, or in response to other compulsory legal process.

From: Rebecca Rutenberg <r.rutenberg@vicentellp.com>
Sent: Tuesday, December 26, 2023 2:24 PM
To: Kyle Potvin <Kyle.Potvin@cccmass.com>
Cc: Tim Callahan <t.callahan@vicentellp.com>
Subject: Re: Question re: Community Outreach Meetings

Hi Kyle –

So sorry to bug you on this. Just wanted to check before the clock runs out. Many thanks!

Becca Rutenberg
Vice President, Eastern Markets + Business Intelligence

Vicente

Prudential Tower
800 Boylston Street, 26th Floor
Boston, MA 02199
cell: 610.675.5958

Serving clients from offices nationwide

From: Rebecca Rutenberg <r.rutenberg@vicentellp.com>
Date: Wednesday, December 20, 2023 at 10:44 AM
To: Kyle Potvin <Kyle.Potvin@cccmass.com>
Cc: Tim Callahan <t.callahan@vicentellp.com>
Subject: Question re: Community Outreach Meetings

Good morning Kyle,

Quick clarifying question for you. I noticed that the Commission did not renew its Administrative Order relative to virtual outreach meetings.

If an applicant has already scheduled an outreach meeting that has been noticed to the public but is scheduled to occur following the expiration of the order, can you confirm that it would still be considered a compliant outreach meeting?

Based on the following language in the administrative order (emphasis added), I believe this to be a justifiable interpretation but will defer to your analysis.

Under this extension, applicants may host virtual meetings **already scheduled** and until the date this amended Final Administrative Order expires in order to provide for the public health, safety, and welfare of consumers and patients who are unable to attend in-person gatherings.

Many thanks!

Becca Rutenberg
Vice President, Eastern Markets + Business Intelligence

Vicente

Prudential Tower

SELECT BOARD MEETING

DECEMBER 19, 2023

SELECT BOARD OFFICE

SELECT BOARD
TOWN OF TEWKSBURY

TOWN HALL
1009 MAIN STREET
TEWKSBURY, MASSACHUSETTS 01876

TODD R. JOHNSON, ESQUIRE, CHAIR
JAMES F. MACKEY, III, VICE CHAIR
PATRICK HOLLAND, CLERK
MARK KRATMAN, MEMBER
JAYNE E. WELLMAN, MEMBER

(978)-640-4300
FAX (978) 640-4302

Notice of Meeting
Tuesday, December 19, 2023 at 7:00 p.m.
Meeting Place: Town Hall, 1009 Main Street, Tewksbury, MA
Todd R. Johnson, Esquire, Chair
Agenda

Scheduled Items

1. 7:00 p.m. J.S. Krishna Corporation d/b/a Hobart's Country Store – Change of DBA, Change of Location and Pledge of License Amendment
2. 7:10 p.m. Aroma Joes – Common Victualler License
3. 7:15 p.m. T&O Corp d/b/a Brothers Sports Bar and Grill – Pledge of License
4. 7:20 p.m. Pera Grill – Common Victualler License
5. 7:25 p.m. The Pull-up LLC – Common Victualler License

Residents

New Business

6. Trahan Elementary School Lease Request for Proposals
7. Marijuana Cultivation – 686 Clark Road
8. Request to Host a Virtual Community Outreach Meeting via Zoom – 686 Cultivation LLC
9. Schedule Retail Marijuana Hearing
10. Acceptance of Donation from the VFW to the Veterans Department
11. Liquor License Renewals
12. Common Victualler License Renewals
13. Amusement License Renewals
14. Entertainment License Renewals
15. Class License Renewals

16. Town Manager

17. Town Counsel Invoice:
    November 1 – 15, 2023 and November 16 – 30, 2023

18. Minutes:
    September 28, 2023 and October 24, 2023

Board Member Reports

Adjourn

Next Select Board Meeting Date:
January 9, 2024
Meetings are televised on Comcast Channel 6 and Verizon Channel 33

REQUEST TO HOST VIRTUAL COMMUNITY OUTREACH MEETING

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686 CULTIVATION LLC

Vicente.

Prudential Tower
800 Boylston Street, 26th Floor
Boston, MA 02199
Tel: 617.934.2121

California · Colorado · Florida · Massachusetts · Michigan · Minnesota · New Jersey · New York · Texas

December 11, 2023

Tewksbury Select Board
1009 Main St
2nd Floor
Tewksbury, MA 01876

Members of the Tewksbury Select Board:

I am reaching out to inquire whether it is acceptable for a proposed marijuana establishment, 686 Cultivation LLC to host a virtual community outreach meeting via Zoom in order to fulfill a Cannabis Control Commission (the "Commission") application requirement.

The Commission has issued an Administrative Order allowing virtual web-based community outreach meetings.[1] We are seeking to host this meeting virtually as we have generally found that hosting these meetings virtually has engendered greater community engagement, but we will of course complete this in whatever fashion the Town deems appropriate.

As part of the Commission's requirements set forth in this Administrative Order, they require that marijuana establishments receive approval from the municipality prior to hosting its Community Outreach Meeting virtually.

Please let me know if you have any questions or would like more information on the process of these virtual meetings.

Thank you.

Best,

Phil Silverman
Partner, Vicente LLP

[1] https://masscannabiscontrol.com/2023/02/final-administrative-order-allowing-virtual-web-based-community-outreach-meetings-february-2023/

Plan to Positively Impact Areas of Disproportionate Impact

Overview

686 Cultivation LLC ("686 Cultivation") is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

1. Past or present residents of the geographic "areas of disproportionate impact," which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions are classified as areas of disproportionate impact.

To support such populations, 686 Cultivation has created the following Plan to Positively Impact Areas of Disproportionate Impact (the "Plan") and has identified and created goals and programs to positively impact such areas.

Goals

686 Cultivation has established the following goals:

1. Give hiring preference to individuals that fall under the Commission's definition of disproportionately affected areas by instituting a preferential hiring program for Lowell residents (specifically those residing within Census Tract 3101, 3104, 3111, 3112, 3117, 3118, 3119, 3120, and 3124) and Massachusetts residents with parents or spouses who have drug convictions, whereby qualified candidates for open job postings will be selected if they self-identify as being from either of the aforementioned groups. At least 15% of employees will qualify under these categories.

2. Host one educational session per year that will provide information on the process to seal a criminal record.

Programs

686 Cultivation has developed specific programs to effectuate its stated goals to positively impact Lowell community residents, Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have drug convictions. Such programs will include the following:

1. Hiring Practices
    a. 686 Cultivation will host one (1) or more job fairs targeted towards residents of Lowell at least 60 days before 686 Cultivation receives its first Commence Operations designation from the Commission to operate a marijuana establishment in an effort to hire West Springfield residents.

b. Lowell residency will be a positive factor in hiring decisions.
c. Massachusetts residents who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions will be a positive factor in 686 Cultivation's hiring decisions.

2. 686 Cultivation CORI Sealing Seminar Program
    a. 686 Cultivation will host one virtual educational seminar per year that will provide information on the process to seal a criminal record.
    b. 686 Cultivation will advertise its CORI Sealing Seminar to marijuana advocacy organizations, the Lowell Sun, and local community groups.
    c. 686 Cultivation will seek to have 20 attendees that watch or download the meeting.

Measurements

The Managing Member will administer the Plan and will be responsible for developing measurable outcomes to ensure 686 Cultivation continues to meet its commitments. Such measurable outcomes, in accordance with the goals and programs described above, include:

- Ensuring that at least 15% of the staff is from Lowell or identify from diverse backgrounds by providing regular staffing audits of employees hired, retained, and promoted;
- Documenting the number of employees who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions; and
- Documenting compliance with annual educational CORI sealing seminars, including the number of seminars held, number of participants, and ways in which 686 Cultivation supported the event.

Acknowledgements

- 686 Cultivation 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 686 Cultivation will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.
- The company acknowledges that the progress or success of its plan must be documented upon renewal (one year from provisional licensure, and each year thereafter).

The Commonwealth of Massachusetts, William Francis Galvin

Corporations Division

One Ashburton Place - Floor 17, Boston MA 02108-1512 | Phone: 617-727-9640

Certificate of Organization

(General Laws, Chapter 156C, Section 12) Filing Fee: $500.00

Identification Number: 001717385 (number will be assigned)

1. The exact name of the limited liability company is:

686 CULTIVATION LLC

2. The address in the Commonwealth where the records will be maintained:

Number and street: 686 CLARK RD

Address 2:

City or town: TEWKSBURY State: MA Zip code: 01876

Country: UNITED STATES

3. The general character of business (if the limited liability company is organized to render professional service, this form must be filed by fax, mail or in person):

TO SUBMIT AN APPLICATION TO THE MASSACHUSETTS CANNABIS CONTROL COMMISSION TO OPERATE A LICENSED CANNABIS CULTIVATION FACILITY.

4. The latest date of dissolution, if specified: (mm/dd/yyyy)

5. The name and address of the Resident Agent:

Agent name: CAPITOL CORPORATE SERVICES, INC.

Number and street: 1157 TUCKER RD

Address 2:

City or town: DARTMOUTH State: MA Zip code: 02747

I CAPITOL CORPORATE SERVICES, INC.,

resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Name	Address
MANAGER	JEFFREY DERBY SR	686 CLARK RD TEWKSBURY, MA 01876 USA

MANAGER	MICHAEL R SACCONE	686 CLARK RD TEWKSBURY, MA 01876 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Name	Address
SOC SIGNATORY	JEFFREY DERBY SR	686 CLARK RD TEWKSBURY, MA 01876 USA
SOC SIGNATORY	MICHAEL R SACCONE	686 CLARK RD TEWKSBURY, MA 01876 USA

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Name	Address
REAL PROPERTY	JEFFREY DERBY SR	686 CLARK RD TEWKSBURY, MA 01876 USA
REAL PROPERTY	MICHAEL R SACCONE	686 CLARK RD TEWKSBURY, MA 01876 USA

9. Additional matters:

10. This certificate is effective at the time and on the date approved by the Division, unless a later effective date not more than ninety (90) days from the date of filing is specified:

Later Effective Date (mm/dd/yyyy): Time (HH:MM)

SIGNED UNDER THE PENALTIES OF PERJURY, this 31 Day of October, 2023,

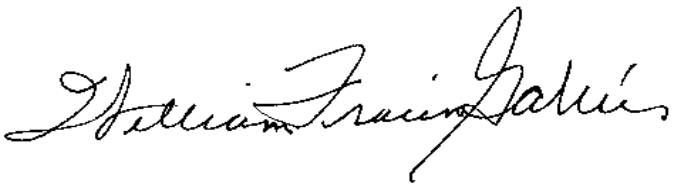
JEFFREY DERBY

, Signature of Authorized Signatory.

THE COMMONWEALTH OF MASSACHUSETTS

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

October 31, 2023 11:50 AM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

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

William Francis Galvin
Secretary of the
Commonwealth

December 21, 2023

TO WHOM IT MAY CONCERN:

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

686 CULTIVATION LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **October 31, 2023.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **JEFFREY DERBY SR, MICHAEL R SACCONE**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **JEFFREY DERBY SR, MICHAEL R SACCONE**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **JEFFREY DERBY SR, MICHAEL R SACCONE**

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Processed By:PMLH

LIMITED LIABILITY COMPANY OPERATING AGREEMENT

among

686 CULTIVATION LLC

and

THE MEMBERS NAMED HEREIN

Dated as of: February 13, 2024

February 13, 2024

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OPERATING AGREEMENT
OF
686 CULTIVATION LLC

This Operating Agreement (this "**Agreement**") of 686 Cultivation LLC (the "**Company**"), a Massachusetts limited liability company, dated as of the 13th day of February, 2024 is entered into by and among those persons who are from time to time listed as members on Schedule A attached hereto in accordance with the terms of this Agreement (individually, "**Member**" and collectively, the "**Members**").

The Company was formed as a Massachusetts limited liability company on the 31st day of October, 2023, under the laws of The Commonwealth of Massachusetts by the filing of the Certificate of Organization in the office of the Secretary of State of the Commonwealth of Massachusetts under Massachusetts General Laws, Chapter 156C (the "**Act**").

1. Management by Manager.

   a. The business and affairs of the Company shall be managed by the managers appointed pursuant to paragraph (b) of this Section (the "**Managers**" and each a "**Manager**"). Except as otherwise expressly provided in the Act or in this Agreement, the Managers, by unanimous consent, shall have full and complete authority, power and discretion to manage and control the business, affairs and properties of the Company, to make all decisions regarding those matters, to appoint and remove officers of the Company and to perform any and all other acts or activities customary or incident to the management of the Company's business. The Managers shall each have the power of a manager under the Act, including, without limitation, to legally represent the Company.

   b. The initial Managers of the Company shall be Jeffrey Derby, Sr. and Michael R. Saccone (the "**Initial Managers**"). Each Initial Manager shall hold office until his or her resignation, removal from office as hereinafter provided or death or incapacity. Each Manager (including the Initial Managers) may be removed, with or without cause, by the affirmative vote of Members holding more than fifty percent (50%) of the total outstanding Units. Any Manager may resign at any time by written notice thereof to the Members. Any vacancy occurring in the Manager position shall be filled by the affirmative vote of Members holding more than fifty percent (50%) of the outstanding Units.

2. Members; Capital Contributions; and Liability of Members.

   a. No Member in the capacity as a Member has any authority to act for, in the name of or on behalf of the Company, or to do any act that would be binding on the Company, or to incur any expenditure on behalf of the Company.

   b. Each Member has contributed in cash to the capital of the Company the amount set forth opposite such Member's name on Schedule A hereto. Each Member shall be entitled to be issued Units in the Company in consideration of his capital contribution.

c. Except as otherwise provided in this Section 2, no Member shall be obligated or permitted to contribute any additional capital to the Company. No interest shall accrue on any contributions to the capital of the Company, and no Member shall have the right to withdraw or to be repaid any capital contributed by it or to receive any other payment in respect of its Units in the Company, including, without limitation, as a result of the withdrawal or resignation of such Member from the Company, except as specifically provided in this Agreement.

d. The liability of the Members for the losses, debts and obligations of the Company shall be limited to their capital contributions. No Member, in his, her or its capacity as a Member (or, if applicable, as a Manager), shall have any liability to restore any negative balance in his, her or its capital account. In no event shall any Member, in his, her or its capacity as a Member, be personally liable for any liabilities or obligations of the Company.

e. New Members may be admitted from time to time (i) in connection with an issuance of Units by the Company, which shall require the unanimous approval of the Managers, and (ii) in connection with a transfer of Units pursuant to Section 4, and in either case, following such new Member's joinder to this Agreement in a form satisfactory to the Managers. Further, a new Member may be admitted into the Company only if the new Member is qualified under M.G.L. c. 94G and 935 CMR 500.000 *et seq*, both as may be amended or replaced from time to time (the "**Cannabis Code**") to have an ownership or economic interest in a Marijuana Establishment.

3. Share of Profits and Other Items. All distributions from the Company, whether interim or upon final liquidation, shall be allocated among the Members pro rata in accordance with their holding of Units of each Member as set forth on Schedule A hereto. No distributions of profits shall be made except by a resolution duly adopted by the holders of 100% of the outstanding Units of the Company.

4. Transfer of a Member's Units. The Members may not transfer their Units without the unanimous consent of the Managers. Notwithstanding the foregoing, no Member may transfer its Units to any transferee that would, upon becoming a Member, be an Affected Member as described in this Agreement.

5. Priorities. No Member shall have any rights or priority over any other Member as to contributions or as to distributions or compensation by way of income.

6. Continuation of the Company. The Company shall continue perpetually until the holders of 100% of the outstanding Units of the Company approve the dissolution of the Company.

7. Termination of Membership; Return of Capital. No Member may terminate his, her or its membership in the Company or have any right to distributions respecting his, her or its Units except as expressly set forth herein. No Member shall have the right to demand or receive property other than cash in return for such Member's contribution.

8. Books and Records; Bank Accounts.

a. The Company shall keep just and true books of account with respect to the operations of the Company.

b. Such books shall be kept on the accrual method of accounting, or on such other method of accounting as the Manager may from time to time determine, and shall be closed and balanced as of December 31 in each year. The fiscal year of the Company shall be the calendar year.

9. Indemnity. Each Manager and each Member shall be entitled to indemnity from the Company for any liability incurred and/or for any act performed by them within the scope of the authority conferred on them by this Agreement, and/or for any act omitted to be performed, except for their gross negligence or willful misconduct, which indemnification shall include all reasonable expenses incurred, including reasonable legal and other professional fees and expenses.

10. Automatic Divestiture. If, during anytime while the Company holds a local or state license pursuant to the Cannabis Code, a Member or a member of an entity that is a Member of Company is not qualified pursuant to the Cannabis Code to hold an ownership or economic interest in a Marijuana Establishment, then all interests of that Member in the Company (the "**Affected Member**") will automatically and immediately terminate, and the Affected Member will cease to be a Member, provided, however, that if the Affected Member is a corporate entity and the Affected Member's disqualification from holding an ownership or economic interest in a Marijuana Establishment is due to a member, shareholder, or officer of the Affected Member, the Affected member shall have an option to redeem its share and shall be restored to its ownership position before the divestiture if the Affected Member provides evidence satisfactory to the Manager that the member, shareholder, or officer that cause such disqualification has been removed. Notwithstanding the foregoing, the automatic divestiture provided by this Section may be waived by a majority vote of the Members, without regard to the Affected Member.

11. Settling of Accounts Following Automatic Divestiture. Unless such Member has become an Affected Member in connection with such Member's gross negligence or willful misconduct, the Company shall be liable for the terminated ownership interest of the Affected Member as follows: (i) The Company and the Affected Member shall determine the fair market value of the Affected Member's Units by a mutually-agreed upon third party appraisal; (ii) if the Affected Member and the Company cannot agree on a third party appraisal, they shall both individually choose and pay for their own appraisal and the differences, if any, between the two valuations of the Affected Member's Units shall be averaged and used for calculating the Payoff Note (as defined herein); (iii) once the value of the Affected Member's Units is determined, the Company shall deliver a note (the "**Payoff Note**") to the Affected Member for one hundred percent (100%) of the value determined by the appraisal or the average of the appraisals. The Payoff Note shall be payable over a five (5) year period and shall bear interest at a rate equal to the applicable federal rate as published at the time of the issuance of the Payoff Note. The terms of the Payoff Note shall include equal monthly payments and shall be reasonable and customary for a transaction of this type. The Company may sell the Affected

Member's Units, in accordance with the terms of this Agreement, to finance the Payoff Note or for any other lawful reason

12. Miscellaneous.

    a. Subject to the restrictions on transfers set forth herein, this Agreement, and each and every provision hereof, shall be binding upon and shall inure to the benefit of the Members, their respective successors, successors-in-title, heirs and permitted assigns; and each and every successor-in-interest to any Member, whether such successors acquires such interest by way of gift, purchase, foreclosure or any other method, shall hold such interest subject to all of the terms and provisions of this Agreement. None of the provisions of this Agreement shall be for the benefit of or enforceable by any creditor of any Member, or any creditor of the Company other than a Member who is such creditor of the Company.

    b. No change, modification or amendment of this Agreement shall be valid or binding unless such change, modification or amendment shall be in writing and duly executed by all of the Members.

    c. This Agreement and the rights and obligations of the parties hereunder shall be governed by and interpreted, construed and enforced in accordance with the laws of The Commonwealth of Massachusetts.

    d. This Agreement may be executed in a number of counterparts, all of which together shall for all purposes constitute one Agreement, binding on all the Members notwithstanding that all the Members have not signed the same counterpart.

    e. Any and all notices under this Agreement shall be effective (i) on the fourth business day after being sent by registered or certified mail, return receipt requested, postage prepaid, or (ii) on the first business day after being sent by express mail, telecopy, or commercial expedited delivery service providing a receipt for delivery. All such notices in order to be effective shall be addressed, if to the Company at its registered office under the Act, and if to a Member at the last address of record on the Company books.

    f. This Agreement embodies the entire agreement and understanding between the parties hereto with respect to the subject matter hereof and supersedes all prior agreements and understandings relating to such subject matter.

13. Advisement of Counsel. THE CULTIVATION, PRODUCTION AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR COMPANY, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

[signature page follows]

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

686 Cultivation LLC

Jeffrey Derby (Feb 13, 2024 14:39 EST)

By: Jeffrey Derby, Sr.
Its: Manager

Michael R. Saccone
Michael R. Saccone (Feb 13, 2024 14:12 EST)

By: Michael R. Saccone
Its: Manager

MEMBERS:

Jeffrey Derby (Feb 13, 2024 14:39 EST)

By: Jeffrey Derby, Sr.

Michael R. Saccone
Michael R. Saccone (Feb 13, 2024 14:12 EST)

By: Michael R. Saccone

SCHEDULE "A"
TO
OPERATING AGREEMENT
OF
686 CULTIVATION LLC

Name	Units
Jeffrey Derby, Sr. Address:	50,000
Michael R. Saccone Address:	50,000

2024.02.13_686 Cultivation - Operating Agreement 4880-5002-6917 v.3

Final Audit Report 2024-02-13

Created:	2024-02-13
By:	Bridgette Nikisher (b.nikisher@vicentesederberg.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAArms6FcOZEjCS8pxfTfe-vRB8EdlDnN0v

"2024.02.13_686 Cultivation - Operating Agreement 4880-5002-6917 v.3" History

Document created by Bridgette Nikisher (b.nikisher@vicentesederberg.com)
2024-02-13 - 7:01:04 PM GMT- IP address: 100.33.18.39

Document emailed to derbysauto@yahoo.com for signature
2024-02-13 - 7:01:09 PM GMT

Document emailed to msaccone@mdrconstruction.com for signature
2024-02-13 - 7:01:09 PM GMT

Email viewed by msaccone@mdrconstruction.com
2024-02-13 - 7:10:20 PM GMT- IP address: 66.30.8.155

Signer msaccone@mdrconstruction.com entered name at signing as Michael R. Saccone
2024-02-13 - 7:12:41 PM GMT- IP address: 66.30.8.155

Document e-signed by Michael R. Saccone (msaccone@mdrconstruction.com)
Signature Date: 2024-02-13 - 7:12:43 PM GMT - Time Source: server- IP address: 66.30.8.155

Email viewed by derbysauto@yahoo.com
2024-02-13 - 7:38:01 PM GMT- IP address: 108.7.16.44

Signer derbysauto@yahoo.com entered name at signing as Jeffrey t Derby
2024-02-13 - 7:39:38 PM GMT- IP address: 108.7.16.44

Document e-signed by Jeffrey t Derby (derbysauto@yahoo.com)
Signature Date: 2024-02-13 - 7:39:40 PM GMT - Time Source: server- IP address: 108.7.16.44

Agreement completed.
2024-02-13 - 7:39:40 PM GMT

Adobe Acrobat Sign

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

mass.gov/dor

Letter ID: L1319299232
Notice Date: February 9, 2024
Case ID: 0-002-297-747

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

686 CULTIVATION LLC
686 CLARK RD
TEWKSBURY MA 01876-1667

000046

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, 686 CULTIVATION LLC is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.

What if I have questions?

If you have questions, call us at (617) 887-6400 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 to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief
Collections Bureau

PLAN FOR OBTAINING LIABILITY INSURANCE

686 Cultivation LLC ("686 Cultivation") will contract with an insurance provider to maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate annually and product liability coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate annually. The policy deductible will be no higher than $5,000 per occurrence. 686 Cultivation will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, 686 Cultivation will place in escrow at least $250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. 686 Cultivation will keep reports documenting compliance with 935 CMR 500.105(10): *Liability Insurance Coverage or Maintenance of Escrow* in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

686 CULTIVATION LLC

BUSINESS PLAN

December 20, 2023

EXECUTIVE SUMMARY

Mission Statement and Message from the CEO

686 Cultivation LLC ("686 Cultivation") is an applicant for Marijuana Establishment Licenses in the Commonwealth that is committed to creating a safe and clean community environment and that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

License Types

686 Cultivation is applying for the following Licenses from the Massachusetts Cannabis Control Commission (the "Commission") to operate Marijuana Establishments in Massachusetts:

- Marijuana Cultivator – Tier 2 – Indoor
- Marijuana Product Manufacturer

What Drives Us

686 Cultivation's goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of 686 Cultivation's operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Marijuana Establishment.

TEAM

Founders

Jeff Derby

Hailing from the picturesque landscapes of Vermont, Jeffrey T. Derby is a distinguished entrepreneur and industry leader with deep roots in the town of Tewksbury. For the past three decades, Jeff has been a dynamic force in both the automotive and cannabis industries, contributing significantly to the economic and social fabric of the community. Jeff's entrepreneurial journey began 30 years ago when he founded Derby's Auto, a thriving automotive business located at 686 Clark Road. This establishment not only marked the inception of his professional career but also served as the foundation for his growing family. The property at 686 Clark Road became more than just a business location; it became a symbol of Jeff's commitment to both business excellence and community building.

As the proud owner of Derby's Auto for 29 years, Jeff has been a fixture in the Dracut, Massachusetts community, providing top-notch automotive services and fostering positive relationships with clients and neighbors alike. His dedication to quality and service has established Derby's Auto as a trusted institution in the region.

In addition to his success in the automotive industry, Jeff brings over 30 years of expertise to the emerging field of cannabis farming and cultivation. As the owner/operator of 686 Cultivation, Jeff is set to lead the charge in overseeing all operations of this cutting-edge grow facility. His wealth of experience in both business management and agriculture positions him as a trailblazer in this evolving industry. Jeffrey T. Derby is not just a businessman; he is a visionary leader committed to the sustainable growth and development of the community he calls home. His dual expertise in automotive services and cannabis cultivation reflects his adaptability and forward-thinking approach to business. Jeff's ventures contribute not only to economic prosperity but also to the overall well-being of Tewksbury, making him an invaluable asset to the town.

Jeffrey T. Derby is more than a business owner; he is a community builder, an innovator, and a testament to the transformative power of diverse expertise in the local business landscape.

Michael R. Saccone
A visionary leader in the construction industry, Michael R. Saccone has spent over four decades dedicated to transforming the New England infrastructure. Born in the heart of Boston, Massachusetts, Michael's journey in construction began with a passion for building and a commitment to excellence.

As the Founder of MDR Construction, Michael has steered the company to become a powerhouse in public works construction, with a specialized focus on heavy highway construction. Under his guidance, MDR has achieved an impressive annual revenue of over $30 million, a testament to Michael's strategic vision and unwavering dedication to quality. MOR Construction has been instrumental in shaping the Commonwealth of Massachusetts' infrastructure landscape, with multiple completed projects for the Massachusetts Department of Transportation {DOT) and various building ventures under Chapter 149. Michael's commitment to excellence and adherence to the highest construction standards have positioned M DR as a trusted partner in the region.

In addition to his role at MOR Construction, Michael is also the Co-Founder of Trux, Inc., a B2B Tech App catering to the unique needs of the construction industry. This innovative platform, borne out of Michael's forward-thinking approach, has streamlined and enhanced operations for countless construction professionals. Through Trux, Michael continues to contribute to the industry's technological evolution, ensuring efficiency and effectiveness in every project. With an unparalleled 44 years in the construction business, Michael Saccone is not just a builder; he is a seasoned developer with a keen eye for transformative projects. His expertise and leadership have earned him recognition and membership in esteemed organizations such as the Utilities Contractors Association of New England (UCANE) and Construction Industries of Massachusetts.

Michael's impact reaches beyond bricks and mortar; it extends to the communities his projects serve. His commitment to excellence, coupled with a genuine passion for the industry, makes him a sought-after voice in the construction community. As Michael R. Saccone stands at the forefront of New England's construction renaissance, his legacy is not just measured in structures built but in the lasting impact on the communities that thrive because of his vision and dedication.

COMPANY DESCRIPTION

Structure

686 Cultivation is a Massachusetts Limited Liability Company that is applying for Licenses from the Commission to operate Marijuana Establishments in the Commonwealth.

686 Cultivation will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment consisting of three packets: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

Operations

686 Cultivation will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana products in the process of cultivation and finished, stored marijuana; conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

686 Cultivation will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

686 Cultivation will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

686 Cultivation will obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than $5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, 686 Cultivation will place in escrow at least $250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. 686 Cultivation will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

686 Cultivation will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state

and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

686 Cultivation will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Prior to commencing operations, 686 Cultivation will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of 686 Cultivation. If 686 Cultivation is unable to secure a surety bond, it will place in escrow a sum of no less than $5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless 686 Cultivation has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

686 Cultivation and 686 Cultivation agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

686 Cultivation will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

686 Cultivation's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only 686 Cultivation's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and 686 Cultivation will maintain a current list of individuals with access. 686 Cultivation will have security personnel on-site during business hours.

On-site consumption of marijuana by 686 Cultivation's employees and visitors will be prohibited.

Benefits to Host Community

686 Cultivation looks forward to working cooperatively with its host community to ensure that 686 Cultivation operates as a responsible, contributing member of Tewksbury. 686 Cultivation has established a mutually beneficial relationship with its host community in exchange for permitting 686 Cultivation to site and operate.

686 Cultivation's host community stands to benefit in various ways, including but not limited to the following:

1. Jobs: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. Monetary Benefits: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
3. Access to Quality Product: 686 Cultivation will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
4. Control: In addition to the Commission, the Police Department and other municipal departments will have oversight over 686 Cultivation's security systems and processes.
5. Responsibility: 686 Cultivation is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. Economic Development: 686 Cultivation's operation of its facilities will help to revitalize its host communities and contribute to the overall economic development of the local community.

Regulations

686 Cultivation will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. 686 Cultivation will apply for all state and local permits and approvals required to build out and operate the facility.

686 Cultivation will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

Products & Services

In addition to traditional sativa, indica, and hybrid cannabis flower, 686 Cultivation will offer a wide range of products that will allow 686 Cultivation to serve customers with a wide variety of needs. Products 686 Cultivation intends to offer include, but will not be limited to:

1. Concentrates
2. Topical Salves
3. Creams and Lotions
4. Tinctures
5. Sprays

6. Inhalation Ready to Use C02 Extracted Hash Oils
7. Pre-Dosed Oil Vaporizers

Pricing Structure
686 Cultivation's pricing structure will vary based on market conditions. 686 Cultivation plans to provide products of superior quality and will price accordingly.

MARKETING & SALES

Growth Strategy
686 Cultivation's plan to grow the company includes:
1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs; and
3. A caring and thoughtful staff made of consummate professionals.

Communication
686 Cultivation will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising, and branding produced by or on behalf of 686 Cultivation will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA." 686 Cultivation will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, 686 Cultivation will market its products and services to reach a wide range of qualified consumers.

686 Cultivation will communicate with customers through:
1. A company run website;
2. A company blog;
3. Popular cannabis discovery networks such as WeedMaps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

686 Cultivation LLC ("686 Cultivation") will securely maintain personnel records, including registration status and background check records. 686 Cultivation 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 operating conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

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 686 Cultivation 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 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.

Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for 686 Cultivation will undergo a detailed background investigation prior to being granted access to a 686 Cultivation facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for 686 Cultivation pursuant to 935 CMR 500.030 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 500.030, 686 Cultivation 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, 686 Cultivation 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, 686 Cultivation 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 686 Cultivation or the Commission.

Personnel Policies and Training

As outlined in 686 Cultivation's 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 686 Cultivation agents are required to complete training as detailed in 686 Cultivation's Qualifications and Training plan which includes but is not limited to 686 Cultivation's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, 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. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

686 Cultivation 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 686 Cultivation 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.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), 686 Cultivation LLC ("686 Cultivation") will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a 686 Cultivation agent will immediately inspect the person's proof of identification and determine the person's age, in accordance with 935 CMR 500.140(2).

In the event 686 Cultivation 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). 686 Cultivation will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), 686 Cultivation will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. 686 Cultivation will not engage in any advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of 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. 686 Cultivation 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)(5), any advertising created 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. Please Consume Responsibly.**" Pursuant to 935 CMR 500.105(6)(b), 686 Cultivation packaging for any marijuana or marijuana products will not use bright colors, defined as colors that are "neon" in appearance, resemble existing branded products, feature cartoons, a design, brand or name that resembles a non-cannabis consumer 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 marketed to minors. 686 Cultivation's 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).

QUALITY CONTROL AND TESTING

Quality Control

686 Cultivation LLC ("686 Cultivation") will comply with the following sanitary requirements:

1. Any 686 Cultivation 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 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any 686 Cultivation 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. 686 Cultivation's 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 686 Cultivation's 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. 686 Cultivation's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. 686 Cultivation 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. 686 Cultivation's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. 686 Cultivation's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. 686 Cultivation's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. 686 Cultivation 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. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. 686 Cultivation acknowledges and understands that the Commission may require 686 Cultivation to demonstrate the intended and actual use of any toxic items found on 686 Cultivation's premises;

11. 686 Cultivation will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet 686 Cultivation's needs;
12. 686 Cultivation's 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 wastewater lines;
13. 686 Cultivation will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. 686 Cultivation 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. 686 Cultivation 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.

686 Cultivation's 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).

686 Cultivation will ensure that 686 Cultivation's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

686 Cultivation 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 686 Cultivation 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.

686 Cultivation will process marijuana in a safe and sanitary manner. 686 Cultivation will process the leaves and flowers of the female marijuana plant only, which will be:

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

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and

any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6).

When selling or otherwise transferring marijuana to another marijuana establishment 686 Cultivation will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Testing

686 Cultivation 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.

Any Independent Testing Laboratory relied upon by 686 Cultivation for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of 686 Cultivation's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of 686 Cultivation's 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 Commission.

686 Cultivation's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of *the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. 686 Cultivation acknowledges and understands that the Commission may require additional testing.

686 Cultivation's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both 686 Cultivation and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

686 Cultivation 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. 686 Cultivation acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

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 686 Cultivation's 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 686 Cultivation for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal.*

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal.*

Quality Control Samples

686 Cultivation may a create sample of Marijuana flower or Marijuana Product ("Marijuana") to be provided internally to employees for purposes of ensuring product quality and making determinations about whether to sell the Marijuana. Quality Control Samples and employee feedback regarding such samples will allow 686 Cultivation to produce the highest quality Marijuana Products for distribution on the adult use market.

Quality Control Samples provided to employees may not be consumed on 686 Cultivation's Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. 686 Cultivation will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they will be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample."

Quality Control Samples will have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: "QUALITY CONTROL SAMPLE NOT FOR RESALE";
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, 686 Cultivation will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and
4. The name of the employee as it appears on their agent registration card.

RECORDKEEPING PROCEDURES

General Overview

686 Cultivation LLC ("686 Cultivation") 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 686 Cultivation documents. Records will be stored at 686 Cultivation 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 686 Cultivation 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 686 Cultivation's quarter-end closing procedures. In addition, 686 Cultivation's 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

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

  Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
  - Assets and liabilities;
  - Monetary transactions;
  - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

    - Sales records including the quantity, form, and cost of marijuana products;
    - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over 686 Cultivation.
- Personnel Records

  At a minimum, Personnel Records will include:
    - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
    - 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 686 Cultivation 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.
    - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
    - Personnel policies and procedures; and
    - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
    - 686 Cultivation will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
    - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
    - 686 Cultivation will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), 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.

- Incident Reporting Records
    - Within ten (10) calendar days, 686 Cultivation will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
    - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by 686 Cultivation 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 within 686 Cultivation's jurisdiction on request.
- Visitor Records
    - A visitor sign-in and sign-out log will be maintained at the security office. The log 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
    - When marijuana or marijuana products are disposed of, 686 Cultivation will create and maintain an electronic 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 686 Cultivation agents present during the disposal or other handling, with their signatures. 686 Cultivation 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
    - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
    - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
    - Recordings shall not be destroyed or altered and shall be retained as long as necessary if 686 Cultivation is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
    - 686 Cultivation will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
    - Records that any and all of 686 Cultivation's vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.

- Agent Training Records
    - 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).
- Responsible Vendor Training
    - 686 Cultivation shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
    - In the event 686 Cultivation closes, all records will be kept for at least two (2) years at 686 Cultivation's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, 686 Cultivation 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 686 Cultivation's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:
    - Security measures in compliance with 935 CMR 500.110;
    - Employee security policies, including personal safety and crime prevention techniques;
    - A description of 686 Cultivation's 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.
    - Storage of marijuana in compliance with 935 CMR 500.105(11);
    - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
    - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
    - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
    - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
    - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
    - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
    - Alcohol, smoke, and drug-free workplace policies;
    - A plan describing how confidential information will be maintained;
    - Policy for the immediate dismissal of any dispensary agent who has:
        - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
        - Engaged in unsafe practices with regard to 686 Cultivation 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.
    - A list of all board of directors, members, and executives of 686 Cultivation, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on 686 Cultivation's website.
    - Policies and procedures for the handling of cash on 686 Cultivation premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
    - Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
    - 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.
    - Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
    - 686 Cultivation shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

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

MAINTAINING OF FINANCIAL RECORDS

686 Cultivation LLC's ("686 Cultivation") 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:
        - Assets and liabilities;
        - Monetary transactions;
        - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
        - Sales records including the quantity, form, and cost of marijuana products; and
        - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over 686 Cultivation.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
    - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
    - Prohibiting the use of software or other methods to manipulate or alter sales data;
    - 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;
        - If 686 Cultivation determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
    - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
    - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
    - 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

Additional written business records will be kept, including, but not limited to, records of:

- 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);
- Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
- Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.

- License Renewal Records
  - 686 Cultivation shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

686 Cultivation LLC ("686 Cultivation") will ensure that all employees hired to work at a 686 Cultivation facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner. 686 Cultivation will maintain a list of anticipated positions and their qualifications.

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.

686 Cultivation will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that 686 Cultivation discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and 686 Cultivation 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 686 Cultivation's agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. An Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program ("RVT") courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-RVT may be conducted in-house by the company or by a third-party vendor engaged by the company. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All 686 Cultivation Agents that are involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

Basic Core Curriculum

686 Cultivation Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
    - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
    - The amount of time to feel impairment;
    - Visible signs of impairment; and
    - Recognizing the signs of impairment.

- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
    - How to check identification;
    - Spotting and confiscating fraudulent identification;
    - Common mistakes made in identification verification.
    - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Agents which shall include:
    - Conduct of Agents;
    - Permitting inspections by state and local licensing and enforcement authorities;
    - Local and state licensing and enforcement, including registration and license sanctions;
    - Incident and notification requirements;
    - Administrative, civil, and criminal liability;
    - Health and safety standards, including waste disposal;
    - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
    - Permitted hours of sale;
    - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
    - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

686 Cultivation will encourage administrative employees who do not handle or sell marijuana to take the "Responsible Vendor" program on a voluntary basis to help ensure compliance. 686 Cultivation's 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 applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each 686 Cultivation Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for 686 Cultivation to maintain designation as a Responsible Vendor. Once the 686 Cultivation Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

ENERGY COMPLIANCE PLAN

686 Cultivation LLC ("686 Cultivation") has developed the following Energy Compliance Plan to ensure that its proposed Cultivation facility remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.103(1)(b), 500.105(1)(q), 500.105(15) and 500.120(11). 686 Cultivation will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

Energy Efficiency and Equipment Standards

686 Cultivation will maintain compliance at all times with the Commission's minimum energy efficiency and equipment standards and meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management, and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control. 686 Cultivation will adopt and use additional best management practices as determined by the Commission to reduce energy.

Building Envelope

The building envelope for 686 Cultivation's cultivation facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C402 or The American 686 Cultivation of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code.

Lighting

686 Cultivation's lighting at the facility will meet the following compliance requirements:

1. Horticulture Lighting Power Density will not exceed 50 watts per square foot as a Tier 2 cultivator; or
2. All horticultural lighting used in the facility will be listed on the current Design Lights Consortium Solid-state Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission and lighting Photosynthetic Photon Efficacy (PPE) is at least 15% above the minimum Horticultural QPL threshold rounded up to the nearest 0.1 μmol/J (micromoles per joule).

In the event that 686 Cultivation seeks to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission, 686 Cultivation will seek a waiver pursuant to 935 CMR 500.850 and provide documentation of third-party certification of the energy efficiency features of the proposed lighting.

686 Cultivation will establish and document safety protocols to protect workers (e.g., eye protection near operating Horticultural Lighting Equipment).

Strategies to Reduce Electric Demand

686 Cultivation is pursuing the following strategies to reduce electric demand. 686 Cultivation will work with contractors to create an energy efficient lighting plan and plans on implementing

low amperage/wattage LED lighting wherever possible. Programs may include lighting schedules, active load management, and energy storage programs.

As the need and opportunity for facility upgrades and maintenance arise in the future, 686 Cultivation will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

686 Cultivation also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to identify other potential energy saving programs and initiatives. 686 Cultivation will also coordinate with its utility companies to explore any energy efficiency options available to 686 Cultivation.

HVAC and Dehumidification

686 Cultivation's Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR State Building Code), IECC Section C403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code). As part of the documentation required under 935 CMR5 00.120(11)(b), 686 Cultivation will provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.

DIVERSITY PLAN

Statement of Purpose

686 Cultivation LLC ("686 Cultivation") recognizes that it has the unique opportunity to implement an intentional, inclusive, and diverse business model that will set the standard for the Commonwealth's cannabis industry. 686 Cultivation has a deep-rooted commitment to establishing a diversity plan that makes purposeful strides towards ensuring that diverse participants and groups are afforded equality of opportunity at all levels of employment or contractual relationship with the company.

Goals

In order for 686 Cultivation to promote equity for the above-listed groups in its operations, 686 Cultivation has established the following goals:

- Hiring such that 686 Cultivation's staff is comprised of at least the following:
    a. 40% women;
    b. 20% BIPOC;
    c. 5% veterans;
    d. 10% LGBTQ+; and
    e. 5% people with disabilities.
- Implementing an annual training program for all employees regarding diversity, equity, and inclusion principles; and
- Creating an inclusive work environment such that 686 Cultivation has no less than an 85% employee satisfaction rate with its DEI initiatives and outcomes.

Programs

686 Cultivation has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- Engaging in equitable hiring efforts by ensuring that jobs are posted (as they become available, but not less than annually) with publications and job resource websites focused on diversity hiring including Blackjobs.com, United Latino Job Bank, LatPro.com, Black Career Network, HBCU Connect, Asian Hires, NAAAP Career Center, iHispano, Diversity Inc., and Diversity Job Board.
- Requiring that each employee complete DEI training (upon hire and each year thereafter). Topics covered during such training will include unconscious bias in the workplace. These trainings will become a part of each employee's personnel file.
- Surveying employees no less than annually to assess its inclusivity and seek areas for improvement and conducting exit interviews to receive feedback on its diversity and inclusivity efforts. 686 Cultivation will use these employee surveys and exit interviews to further inform adjustments to its diversity and inclusivity efforts.

Measurements

The Executive Management Team will administer the Plan and will be responsible for developing measurable outcomes to ensure 686 Cultivation continues to meet its commitments. Such measurable outcomes, in accordance with 686 Cultivation's goals and programs described above, include:

- Completing voluntary employee surveys that evidence 686 Cultivation's

employee demographics;
- Documenting any job advertisements placed with publications and job resource websites focused on diversity hiring;
- Evidencing all employee trainings on DEI concepts and initiatives; and
- Documenting all surveys and exit interviews of staff with respect to 686 Cultivation's diversity and inclusivity efforts.

Beginning upon receipt of 686 Cultivation's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, 686 Cultivation will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Executive Management Team will review and evaluate 686 Cultivation's measurable outcomes no less than twice annually to ensure that 686 Cultivation is meeting its commitments. 686 Cultivation is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- 686 Cultivation 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 686 Cultivation will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.