



Massachusetts Cannabis Control Commission

Marijuana Courier

General Information:

License Number: DO100191
Original Issued Date: 09/11/2025
Issued Date: 09/11/2025
Expiration Date: 09/11/2026

MARIJUANA COURIER PRE-CERTIFICATION NUMBER

Marijuana Courier Pre-Certification Number:
PDO103699

ABOUT THE MARIJUANA COURIER LICENSEE

Business Legal Name: Acumen Collective LLC

Phone Number: 857-445-1127 **Email Address:** shanel.lindsay@gmail.com

Business Address 1: 3 FARM POND PATH **Business Address 2:**

Business City: MANSFIELD **Business State:** MA **Business Zip Code:** 02048

Mailing Address 1: 13 ROBBINS ST **Mailing Address 2:**

Mailing City: WALTHAM **Mailing State:** MA **Mailing Zip Code:** 02453

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PERSONS HAVING DIRECT OR INDIRECT CONTROL

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control:

100

Role: Owner / Partner

Other Role:

First Name: Shanel

Last Name: Lindsay **Suffix:**

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

ENTITIES HAVING DIRECT OR INDIRECT CONTROL

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

Individual 1

First Name: Shanel **Last Name:** Lindsay **Suffix:**
Marijuana Establishment Name: ADVESA MA LLC **Business Type:** Marijuana Retailer
Marijuana Establishment City: Somerville **Marijuana Establishment State:** MA

MARIJUANA COURIER LICENSEE PROPERTY DETAILS

Establishment Address 1: 90 CONZ ST. #219L **Establishment Address 2:**
Establishment City: Northampton **Establishment Zip Code:** 01060
Approximate square footage of the establishment: 400 **How many abutters does this property have?:** 28
Have all property abutters been notified of the intent to open a Marijuana Courier Licensee at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	Abutter Notice - [Attachment C] - {Acumen} - (3.18.25).pdf	pdf	682ea24a2309ac25e3562b33	05/22/2025
Community Outreach Meeting Documentation	COM Attestation Form - [Signed] - {Acumen} - (3.31.25).pdf	pdf	682ea24e6cf3645b62fee9a2	05/22/2025
Community Outreach Meeting Documentation	COM Newspaper Acumen.pdf	pdf	682ea2546cf3645b62fee9b6	05/22/2025
Community Outreach Meeting Documentation	COM Town letter Acumen (1).pdf	pdf	682ea25b2309ac25e3562b47	05/22/2025
Executed HCA	Northampton - Acumen Coll - HCA 4 -2025-merged (1).pdf	pdf	682ea25f2309ac25e3562b5b	05/22/2025
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning - [Northampton] - {Acumen} - 5.20.25.pdf	pdf	682ea2692309ac25e3562b72	05/22/2025
Community Outreach Meeting Documentation	COM Abutters 90 Conz Redacted.pdf	pdf	682eb3e62309ac25e3562f21	05/22/2025

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	Positive Impact Plan - {Acumen Collective LLC} - (6.3.25) .pdf	pdf	683f55f96cf3645b6209765e	06/03/2025

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Shanel

Last Name: Lindsay Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Cert of GS DOR - {Acumen} - (4.17.25).pdf	pdf	682ea5796cf3645b62feea79	05/22/2025
Department of Unemployment Assistance - Certificate of Good standing	Cert of GS DUA - {Acumen} - (05.20.25).pdf	pdf	682ea57b2309ac25e3562cf1	05/22/2025
Secretary of Commonwealth - Certificate of Good Standing	Cert of GS SOC - {Acumen} - (3.26.25).pdf	pdf	682ea5892309ac25e3562d05	05/22/2025

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Certificate of Organization - {Acumen}.pdf	pdf	682ea5bd6cf3645b62feea99	05/22/2025
Bylaws	Bylaws - {Acumen} - (6.3.25).pdf	pdf	683f52232309ac25e36063e3	06/03/2025

Massachusetts Business Identification Number: 001844677

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Insurance - {Acumen Collective LLC} - (2025).pdf	pdf	67e4efc685fc04b7dce2f458	03/27/2025
Proposed Timeline	Proposed Timeline - {Acumen} - (3.28.25).pdf	pdf	67e6ae5a3b8f2e45c6e00127	03/28/2025
Capitalization Table	Acumen Collective Cap Table.pdf	pdf	67e6af3085fc04b7dce420ce	03/28/2025
Operating Agreement or Articles of Incorporation	Single Member Operating Agreement - {Acumen} - (3.28.25).pdf	pdf	67e6b2e9d80aaa0db43e4206	03/28/2025
Business Plan	Biz Plan Courier - {Acumen} - (5.1.25).pdf	pdf	6813b1eb024b4d8d5ac4fa42	05/01/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload
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				Date
Delivery procedures (pursuant to 935 CMR 500.145)	Delivery Plan Procedures - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb603b8f2e45c6deddfb	03/27/2025
Energy Compliance Plan	Energy Compliance Plan - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb6285fc04b7dce2f2b3	03/27/2025
Inventory procedures	Inventory Procedures - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb643b8f2e45c6dede0f	03/27/2025
Maintenance of financial records	Maintaining Financial Records - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb663b8f2e45c6dede23	03/27/2025
Personnel policies	Personnel Policies - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb6885fc04b7dce2f2c7	03/27/2025
Prevention of diversion	Prevention of Diversion - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb8c85fc04b7dce2f2de	03/27/2025
Qualifications and training	Qualification and Training - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb8e3b8f2e45c6dede3a	03/27/2025
Quality control and testing procedures	Quality Control and Testing - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb8f85fc04b7dce2f2f2	03/27/2025
Record-keeping procedures	Recordkeeping Procedures - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb913b8f2e45c6dede4e	03/27/2025
Security plan	Security Plan - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eb933b8f2e45c6dede65	03/27/2025
Storage of marijuana	Storage Plan - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eba23b8f2e45c6dede79	03/27/2025
Transportation of marijuana	Transportation Plan - [Courier Delivery] - {Acumen} - (2025).pdf	pdf	67e4eba485fc04b7dce2f309	03/27/2025
Diversity plan	Updated - Plan to restrict access 21 - [Courier] - {Acumen} - (6.4.25).docx.pdf	pdf	683fe06b2309ac25e360a86e	06/04/2025
Diversity plan	Diversity Plan - {Acumen} - (6.4.25).pdf	pdf	683fe07a2309ac25e360a882	06/04/2025
Diversity plan	Logo Design for Acumen Collective.png	png	683feaf26cf3645b6209b576	06/04/2025

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 9:00 PM
Tuesday From: 8:00 AM	Tuesday To: 9:00 PM
Wednesday From: 8:00 AM	Wednesday To: 9:00 PM
Thursday From: 8:00 AM	Thursday To: 9:00 PM
Friday From: 8:00 AM	Friday To: 9:00 PM
Saturday From: 8:00 PM	Saturday To: 9:00 PM
Sunday From: 8:00 AM	Sunday To: 9:00 PM

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.:

AGREEMENTS WITH MARIJUANA RETAILERS

No records found

MARIJUANA RETAILER AGREEMENT DOCUMENTATION

No documents uploaded

AGREEMENTS WITH THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER

No records found

THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER DOCUMENTATION

No documents uploaded

Acumen Collective LLC
90 Conz St. Unit 219L
Northampton, MA 01060

To: Abutters within 300' of 90 Conz St.
and Northampton City Departments

March 18, 2025

Dear Abutters and City of Northampton,

The Marijuana Courier entity above is giving notice of a Community Outreach Meeting on March 31, 2025, at 5:15 pm at 90 Conz St, Suite 219L, Northampton, MA 01060, their proposed location. This is a private office that will house the corporate records of the Marijuana Courier company. No deliveries, personnel, marijuana products, vehicles, or any operations will take place at the site but a community meeting is a state requirement. There will be an opportunity for the public to ask questions or, email ezra@blueskiescan.com

Sincerely,



Ezra Parzybok
Consultant to Acumen Collective LLC

Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Attestation

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

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



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

a. Date of publication:

b. Name of publication:

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

a. Date notice filed:

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

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:

- 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:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



MAKING NEWS

Chamber announces hire, promotion

NORTHAMPTON — The Greater Northampton Chamber of Commerce has hired **Nia Stimage-Norwood** as a program assistant and promoted **Jack Brown** to marketing director.

Stimage-Norwood, who joined the chamber last fall, has frontline responsibility for the Visitor Center and the Northampton Gift Card Program, as well as project management support across key functions including investor relations, marketing and communications, and event planning.

Stimage-Norwood grew up in Springfield and attended college at Westfield State University where she received a bachelor's in music for classical vocal performance.

Prior to the GNCC, she spent three years at Falcetti School of Music in Springfield, where she worked her way up from part-time administrative assistant to enrollment manager/social media coordinator.

Brown's promotion recognizes his leadership across multiple projects that have increased brand awareness and overall growth for the GNCC.

Since joining the GNCC in 2021, Brown has played a pivotal role in elevating the organization's marketing and communications to deliver on an important strategic imperative for a "clear message and broader reach."

Brown conceived and launched the northamptonist newsletter in 2023, led the redesign of both the Chamber and Gift Card websites and launched THRIVE, a new publication that features stories of the businesses and organizations in Northampton.

On the tourism front, Brown is the driving force behind Hampshire County's high-performing tourism campaigns and partnerships, which leverages his strong creative design and technology skills.

Tae kwon do school to host open house in new Northampton location

NORTHAMPTON — River Valley Taekwondo will open its new dojang (training hall) on the fourth floor at 25 Main St. for an open house from 3 to 6 p.m. on Sunday. All are welcome to attend.

Founded in 1997, River Valley offers instruction for adults (age 14 and up). The Jidokwan style of tae kwon do practiced is a noncompetitive tradition, rigorously technical in nature with a Korean cultural context.

The school also features a comprehensive self-study program for lifelong learners who want to explore martial arts-adjacent themes.

River Valley's unique membership plan offers discounted or free classes for its most dedicated students.

The school's new home in the Fitzwilly's building was originally designed as a ballroom for the Freemasons and has been used by thousands of artists, musicians and dancers in the last half century.

With its 20-foot ceiling and hardwood floors, the space has proven to be the ideal setting to practice this timeless

SEE NEWS B5



NIA STIMAGE-NORWOOD



JACK BROWN

HOLYOKE

Food is in their DNA

New restaurant Casa del Pollo offers African American soul food and Latin cuisines



Pork loaded fries and a three-piece chicken with a Kings Hawaiian roll at Casa del Pollo.

By **SAMUEL GELINAS**
Staff Writer

HOLYOKE — While Casa del Pollo just opened last month, its soul food menu has been developing for generations — a business built to model the childhood dinner table, and revive expressions of comfort, joy and community that comes from cuisine.

The small shop at 642 High St., whose name translates to House of Chicken, offers a fusion of African American soul food and Latin cuisines, including fried wings, rice and beans and fried pork, as well as specials every week-end that bring in anything from oxtails, turkey wings, Rasta pasta or Alfredo lasagna.

First-time business owner Alexis Rentas opened the doors of Casa del Pollo to be a time machine to her childhood dining room table. While she is a licensed cosmetologist and is setting up a shop in Indian Orchard currently, she said the new restaurant has especially personal roots for her.

"This is one of my ways of being able to give the love that I received from my mom. She was the family cook, and this is something that ties me back to her," said Rentas, a Springfield native.

The recipes and traditions received from her parents are now a means to gaining "generational wealth," she said, as she offers vintage home

recipes to consumers.

With \$20,000 she outfitted the space that had formerly been vacant beside High Street Liquors. Her father co-owns the liquor store next door, and "we wanted to be able to bring some revenue to the area, and give back," said Rentas.

The restaurant is open daily until 9 p.m., except for Saturday when customers can get late-night meals until 3 a.m. Additionally, Rentas says Casa del Pollo is gearing up to offer its menu on Door Dash and Uber Eats, and may set up some picnic tables on the sidewalk outside once the nice weather comes in the spring.

Both Rentas and the joint's chef, Idella Sanders, said that food has been a fixture of their lives since the cradle, as both grew up in mixed Black and Hispanic households that were devoted to traditional

foods.

Sanders, who works for a residential rehab program cooking full time in addition to working weekends at the House of Chicken, said food is "in my DNA," and has had a passion for cooking since childhood.

"I starting cooking with my grandmother, and I always fell in love with the reactions of how people just loved her food," she said, noting that among her favorite dishes to prepare include

"I put so much love into it and seek advice and just have fun with it."

IDELLA SANDERS
joint chef, with owner Alexis Rentas, at Holyoke's Casa del Pollo

SEE CASA DEL POLLO B5



Alexis Rentas, owner of Casa del Pollo on High Street in Holyoke, and manager Phillip Langley talk about the new restaurant late last month. "This is one of my ways of being able to give the love that I received from my mom," Rentas said. "She was the family cook, and this is something that ties me back to her."

STAFF PHOTOS/CAROL LOLLIS

AREA PROPERTY DEED TRANSFERS

AMHERST
Stone Free LLC to Peter Laznicka and Kathryn Chang, Odd Meadow Street, \$850,000

BELCHERTOWN
Helen O. McConnell to Alexander C. Alvarado and Johanna R. Alvarado, 245 Cold Spring Road, \$475,000

CUMMINGTON
Kenneth L. Howes and Justin Howes to Hillside Agricultural Society, Fairgrounds Road (off), \$56,000

EASTHAMPTON
Joseph E. Reopel to Valery Raymond and Mark Dergivanessian, 6

Boylston St., \$175,000
HOLYOKE
Federal Natl Mtg Assn to Charlotte E. Pascal and Jean R. Figaro, 46 Davis St., \$394,500

Arment & Vanzandt Rlty In to Wyckoff Estates LLC, 233 Easthampton Road, \$2,660,000

Elizabeth Hanssen and James J. Flannery to Elizabeth Hanssen, 19 Fairfield Ave., \$67,324

Aad LLC to June Ventures Inc., 148-154 High St., \$750,000

Hector R. Rosado to Hector R. Burgos, 58 Longwood Ave.,

\$317,000
Holyoke City Of to Johnna Caizan-Torres, 285-287 Main St., \$15,000

Kathryn A. Tremblay to Patrick B. Lavelle Jr., 2 Montgomery Ave., \$16,250

Gail M. Cauley to Margaret Dixon and Cora Lambert, 1177 Northampton St., \$308,500

Weary Travelers LLC to Jessica

Marrero, 31 Sherwood Terrace, \$309,500

Virgilio Prop Mgmt Inc and Edward P. Plante Sr. to Pah Properties LLC, 311 Walnut St., \$225,000

MIDDLEFIELD
Kozynoski Jonn J Est and Daniel J. Kozynoski to Noel W. Keeney, 266 Skyline Trl, \$164,500

NORTHAMPTON
Gail L. Perlman and Michael S.

Perlman to Jonathan Moosekian and Kristi Moosekian, 76 Marian St., \$1,025,000

Jeanne Kocsis RET and Michael Hooker to D H & Jamie L Pierce Jret and David H. Pierce, 23 Randolph Place, Lot 304, \$376,000

4 Aces Realty LLC to Shana Hirandani, 107 Williams St., Lot B1, \$500,000

SEE DEEDS B5

LEGAL NOTICES

Legals

Legal Notice

The Southampton Conservation Commission will hold a public hearing on 3/17/25 for the following:

A Notice of Intent application Islam Agayev to repair and upgrade the septic system and remove vegetation at 34 Blumer Rd.

The hearing will be held via Zoom and will begin at 6:00 PM. The Zoom link (Southampton MA (mytowngovernment.org)) will be available 48 hours before the meeting. Copies of the applications may be examined at the Conservation Office and/or the Town Clerk's Office in the Southampton Town Hall, 210 College Highway, Southampton, MA, 01073.

4443502



Legals

MHEC MC12-G03 HVAC- Re
Opening

Post Date: 3/4/2025
Return/Open Date: 4/9/2025
11:00am est

The MHEC is reopening this solicitation to seek suppliers capable of providing comprehensive refrigerant-related supply and services. Will be received electronically via Bid Express for more information, visit MHEC.net March 7

4443516

Legals

Outreach Meeting

The Marijuana Courier, Acumen Collective LLC, is giving notice of a Community Outreach Meeting on March 31st, 2025, at 5:15 pm at 90 Conz St., #219 L Northampton, MA 01060, its proposed location. This is a private office, the operation of which will be to house the corporate records of the Marijuana Courier. No deliveries, drivers, marijuana products, vehicles storage, or any additional operations besides location compliance and record storage will take place at the site. Email ezra@blueskiescan.com with questions.

4443485

Community Connectors

I can connect your business with local, regional and national prospects offering **UNLIMITED** business connections!

I'm Zac Brittain and I'm a Media Consultant with the Daily Hampshire Gazette and NNE, the digital arm of the Gazette and Recorder. Let's talk about how our media group can deliver results for YOU!

Zac Brittain
Media Consultant
413-585-5277
zbrittain@gazettenet.com

Acumen Collective LLC
90 Conz St. Unit 219L
Northampton, MA 01060

To: Abutters within 300' of 90 Conz St.
and Northampton City Departments

March 18, 2025



Dear Abutters and City of Northampton,

The Marijuana Courier entity above is giving notice of a Community Outreach Meeting on March 31, 2025, at 5:15 pm at 90 Conz St, Suite 219L, Northampton, MA 01060, their proposed location. This is a private office that will house the corporate records of the Marijuana Courier company. No deliveries, personnel, marijuana products, vehicles, or any operations will take place at the site but a community meeting is a state requirement. There will be an opportunity for the public to ask questions or, email ezra@blueskiescan.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Ezra Parzybok".

Ezra Parzybok
Consultant to Acumen Collective LLC

Acumen Collective LLC Northampton; Plan to Remain Compliant with Local Zoning:

Acumen Collective LLC is located in the GB-zoned district of the City of Northampton and attests that it will, through its operation of a Courier delivery establishment in the City of Northampton, MA, follow and remain compliant with all local zoning requirements, including but not limited to the following sections of the Northampton Zoning Bylaw:

Building Regulations, Chapter 145, Articles I-IV, sections § 145-16-30

Building, Electrical, and Plumbing, Signage § 350-7

Off-Street parking requirements, § 350-8.1

Courier marijuana establishments **are allowed by-right in General Business** zones, off-duty vehicles are allowed to be stored off street at owner's home, parking facility, or other off street site, and no special permit or site plan is required. A certificate of occupancy is required after obtaining building permits and inspections of renovation, if applicable.

The **duration of the permits are unlimited** until a change of use and new building permit is secured at the location. No other provisions are stipulated locally.

[REDACTED]
20 FRUIT ST
NORTHAMPTON MA 01060

[REDACTED]
27 HOWARD AVE
EASTHAMPTON MA 01027

[REDACTED]
118 MAPLE ST
EASTHAMPTON MA 01027

[REDACTED]
336 COLES MEADOW RD
NORTHAMPTON MA 01060

[REDACTED]
705 NORTH FARMS RD
FLORENCE MA 01062

[REDACTED]
137 ELM ST
NORTHAMPTON MA 01060

[REDACTED]
66 PROSPECT ST
HATFIELD MA 01038

[REDACTED]
13 TRUMBULL RD
NORTHAMPTON MA 01060

[REDACTED]
1 MONARCH PLACE SUITE 2500
SPRINGFIELD MA 01144

[REDACTED]
36 KING ST
NORTHAMPTON MA 01060

[REDACTED]
81 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60522
FLORENCE MA 01062

[REDACTED]
2 MAIN ST
NORTHAMPTON MA 01060

[REDACTED]
90 CONZ ST #3
NORTHAMPTON MA 01060

[REDACTED]
90 CONZ ST UNIT 4
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60522
FLORENCE MA 01062

[REDACTED]
36 FRUIT ST
NORTHAMPTON MA 01060

[REDACTED]
48 HOLY FAMILY RD APT 120
HOLYOKE MA 01040

[REDACTED]
22 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
12 OAK RIDGE CIR
EASTHAMPTON MA 01027

[REDACTED]
6-8 WRIGHT AVE
NORTHAMPTON MA 01060

[REDACTED]
115A CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
74 CONZ ST
NORTHAMPTON MA 01060

[REDACTED]
P O BOX 60376
FLORENCE MA 01062

Acumen Collective LLC

Positive Impact Program

Introduction

This program will meet the spirit and objectives of state law M.G.L. Ch. 94G §4 requires Licensed Marijuana Establishments to, “...engage in processes and policies that promote and encourage full participation in the regulated cannabis industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities.”

The Commission has identified the groups this plan is intended to impact as the following:

- Past or present residents of the geographic ADI, which have been defined by the Commission and identified in its *Guidance for Identifying Areas of Disproportionate Impact*.
- Commission-designated Economic Empowerment Priority applicants;
- Commission-designated Social Equity Program participants;
- Massachusetts residents who have past drug convictions; and
- Massachusetts residents with parents or spouses who have drug convictions.
- The above groups or other residents of Brockton, an Area of Disproportionate Impact

Acknowledgments

The applicant 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.

No actions taken, or programs instituted by the applicant will violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.

No donation or program to support any specifically named organizations or the furtherance of their goals have been proposed as this is a direct mentor-to-mentee program.

The progress or success of this plan will be documented upon renewal (one year from provisional licensure and each year after.)

Community Presence in an ADI: As courier operations are solely delivering between a retail not necessarily where the location is, and residences, with all other activity taking place remotely, Holyoke is the closest ADI to Northampton. Any work for ADIs as of this writing will focus on Holyoke.

Programs:

1. Incubator Program

- a. We will provide incubation services to at least one Social Equity or Economic Empowerment (SE/EE) team per year. Recruitment will occur through CCC-hosted equity networking events, LinkedIn outreach, the socialequity2@googlegroups.com email list, and word-of-mouth within our professional network.
- b. Support includes up to 20 hours of licensing consultation, assistance preparing HCA materials, and application support to help incubated teams reach a milestone such as: license application submission, location control, or execution of an HCA.

2. For Engagement with SE-Owned Businesses:

- a. Collaborate with industry-specific professionals, ancillary and licensed, with owners designated as SE, and identify potential SE-owned business partners through our contacts and networking.
- b. As for finding ancillary businesses, our network within the industry knows of consultants, professionals, and contractors whose owners are certified as Social Equity or Economic Empowerment and operating their businesses while they pursue or sustain participation in the industry. Our engagement with these companies will be through word of mouth among the SE/EE cohort networking events established by the CCC equity department, email groups like socialequity2@googlegroups.com, attending conferences and industry events, and other means. We will engage with at least one SE-owned ancillary business per year, including professionals in compliance, marketing, security, or operations. We will identify partners through CCC's equity directory, SDO supplier lists, and industry networking events such as NECANN and MJBizCon.

Goals:

These above programs will facilitate direct assistance in the achievement of some or all of the following goals for at least one social equity business and hiring Holyoke PTGs:

1. Incubator:

- a. Engage with one entity owned by an individual or team seeking to bring their skills to the regulated industry and achieve at least one major milestone in the licensing process such as location control, HCA executed, License application submitted, or further steps.

2. Engage with at least one SE-owned ancillary business.

- a. Form partnerships with at least one Social Equity (SE)-owned ancillary business annually and one SE-owned operating licensee.

Measurements and Metrics:

1. For Incubator:

- a. Count the number of incubator teams we are assisting, noting milestone progress (location secured, license submitted, HCA signed). Track hours of support provided and key deliverables (e.g., application drafts, budgets, corporate documents).

2. For Engagement with SE-Owned Businesses:

- a. Track the number of SE-owned businesses engaged annually. Target: minimum one new SE-owned vendor and one licensed SE operator per year. Include names, services contracted, and terms of engagement.

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:	001844677	(number will be assigned)
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1. The exact name of the limited liability company is:

ACUMEN COLLECTIVE LLC

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

Number and street: 3 FARM POND PATH

Address 2: UNIT 2

City or town: MANSFIELD State: MA Zip code: 02048

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):

WHOLESALE, RETAIL, MANUFACTURING, MARKETING, EDUCATIONAL AND OTHER ALLOWABLE RELATED ACTIVITIES

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

5. The name and address of the Resident Agent:

Agent name: SHANEL LINDSAY

Number and street: 3 FARM POND PATH

Address 2: UNIT 2

City or town: MANSFIELD State: MA Zip code: 02048

I SHANEL LINDSAY,
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.

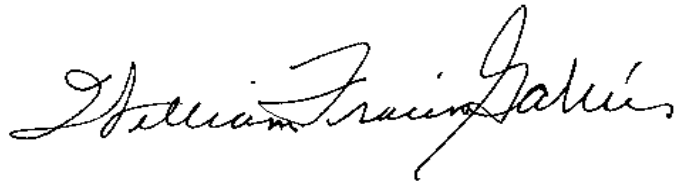
6. The name and business address of each manager, if any:

Title	Name	Address

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 16, 2024 08:28 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

Accumen Collective LLC

Bylaws

ARTICLE I OFFICES

Section 1. The principal office of this corporation shall be in the Commonwealth of Massachusetts.

Section 2. The corporation may also have offices at such other places both within and without the Commonwealth of Massachusetts as the Board of Directors may from time to time determine or the business of the corporation may require.

ARTICLE II MEETINGS OF STOCKHOLDERS

Section 1. All annual meetings of the stockholders shall be held at the registered office of the corporation or at such other place within or without the Commonwealth of Massachusetts as the directors shall determine. Special meetings of the stockholders may be held at such time and place within or without the Commonwealth as shall be stated in the notice of the meeting, or in a duly executed waiver of notice thereof.

Section 2. Annual meetings of the stockholders shall be held in May of each year as may be set by the Board of Directors from time to time, at which the stockholders shall elect by vote a Board of Directors and transact such other business as may properly be brought before the meeting. Meetings may be held by telephonic conference call provided all stockholders are present telephonically or have expressly declined to participate.

Section 3. Special meetings of the stockholders, for any purpose or purposes, unless otherwise prescribed by statute or by the Articles of Organization, may be called by the President or the Secretary by resolution of the Board of Directors or at the request in writing of stockholders owning a majority in amount of the entire capital stock of the corporation issued and outstanding and entitled to vote. Such a request shall state the purpose of the proposed meeting.

Section 4. Notices of meetings shall be in writing and signed by the President or the Secretary or by such other person or persons as the directors shall designate. Such notices shall

state the purpose or purposes for which the meeting is called and the time and the place, which maybe within or without the Commonwealth, where it is to be held. A copy of such notice shall be either delivered personally to or shall be mailed, postage prepaid, to each stockholder of record entitled to vote at such meeting not less than ten nor more than sixty days before such meeting. If mailed, it shall be directed to a stockholder at his address as it appears upon the records of the corporation and upon such mailing of any such notice, the service thereof shall be complete and the time of the notice shall begin to run from the date upon which such notice is deposited in the mail for transmission to such stockholder. Personal delivery of any such notice to any officer of a corporation or association, or to any member of a partnership shall constitute delivery of such notice to such corporation, association or partnership. In the event of the transfer of stock after delivery of such notice of and prior to the holding of the meeting it shall not be necessary to deliver or mail notice of the meeting to the transferee.

Section 5. Business transacted at any special meeting of stockholders shall be limited to the purposes stated in the notice.

Section 6. The holders of a majority of the stock, issued and outstanding and entitled to vote thereat, present in person or represented by proxy, shall constitute a quorum at all meetings of the stockholders for the transaction of business except as otherwise provided by statute or by the Articles of Organization. If, however, such quorum shall not be present or represented at any meeting of the stockholders, the stockholders entitled to vote thereat, present in person or represented by proxy, shall have power to adjourn the meeting from time to time, without notice other than announcement at the meeting, until a quorum shall be present or represented. At such adjourned meeting at which a quorum shall be present or represented, any business may be transacted which might have been transacted at the meeting as originally notified.

Section 7. When a quorum is present or represented at any meeting, the vote of the holders of a majority of the stock having voting power present in person or represented by proxy shall be sufficient to elect directors or to decide any question brought before such meeting, unless the question is one upon which by express provision of the statutes or of the Articles of Organization, a different vote is required in which case such express provision shall govern and control the decision of such question.

Section 8. Each stockholder of record of the corporation shall be entitled at each meeting of stockholders to one vote for each share of stock standing in his name on the books of the corporation. Upon the demand of any stockholder, the vote for directors and the vote upon any question before the meeting shall be by ballot.

Section 9. At any meeting of the stockholders any stockholder may be represented and vote by a proxy or proxies appointed by an instrument in writing. In the event that any such instrument in writing shall designate two or more persons to act as proxies, a majority of such persons present at the meeting, or, if only one shall be present, then that one shall have and may exercise all of the powers conferred by such written instrument upon all of the persons so designated unless the instrument shall otherwise provide. No proxy or power of attorney to vote shall be used to vote at a meeting of the stockholders unless it shall have been filed with the secretary of the meeting when required by the inspectors of election. All questions regarding the

qualification of voters, the validity of proxies and the acceptance or rejection of votes shall be decided by the inspectors of election who shall be appointed by the Board of Directors, or if not so appointed, then by the presiding officer of the meeting.

Section 10. Any action which may be taken by the vote of the stockholders at a meeting may be taken without a meeting if authorized by the written consent of stockholders holding at least a majority of the voting power, unless the provisions of the statutes or of the Articles of Organization require a greater proportion of voting power to authorize such action in which case such greater proportion of written consents shall be required.

ARTICLE III DIRECTORS

Section 1. The business of the corporation shall be managed by its Board of Directors which may exercise all such powers of the corporation and do all such lawful acts and things as are not by statute or by the Articles of Organization or by these Bylaws directed or required to be exercised or done by the stockholders.

Section 2. The number of directors which shall constitute the whole board shall initially be one (1). The number of directors may from time to time be increased or decreased to not less than one nor more than seven (7) by action of the Board of Directors. The directors shall be elected at the annual meeting of the stockholders and except as provided in Section 2 of this Article, each director elected shall hold office until his successor is elected and qualified. Directors need not be stockholders.

Section 3. Vacancies in the Board of Directors including those caused by an increase in the number of Directors, may be filled by a majority of the remaining directors, though less than a quorum, or by a sole remaining director, and each director so elected shall hold office until his successor is elected at an annual or a special meeting of the stockholders. The holders of a two-thirds of the outstanding shares of stock entitled to vote may at any time peremptorily terminate the term of office of all or any of the directors by vote at a meeting called for such purpose or by a written statement filed with the secretary or, in his absence, with any other officer. Such removal shall be effective immediately, even if successors are not elected simultaneously and the vacancies on the Board of Directors resulting therefrom shall be filled only by the stockholders.

A vacancy or vacancies in the Board of Directors shall be deemed to exist in case of the death, resignation or removal of any directors, or if the authorized number of directors be increased, or if the stockholders fail at any annual or special meeting of stockholders at which any director or directors are elected to elect the full authorized number of directors to be voted for at that meeting.

The stockholders may elect a director or directors at any time to fill any vacancy or vacancies not filled by the directors. If the Board of Directors accepts the resignation of a director tendered to take effect at a future time, the Board or the stockholders shall have power to elect a successor to take office when the resignation is to become effective.

No reduction of the authorized number of directors shall have the effect of removing any director prior to the expiration of his term of office.

ARTICLE IV MEETINGS OF THE BOARD OF DIRECTORS

Section 1. Regular meetings of the Board of Directors shall be held at any place within or without the Commonwealth or by written consent of all members of the Board. In the absence of such designation regular meetings shall be held at the registered office of the corporation. Special meetings of the Board may be held either at a place so designated or at the registered office.

Section 2. The first meeting of each newly elected Board of Directors shall be held immediately following the adjournment of the meeting of stockholders and at the place thereof. No notice of such meeting shall be necessary to the directors in order legally to constitute the meeting, provided a quorum be present. In the event such meeting is not so held, the meeting may be held at such time and place as shall be specified in a notice given as hereinafter provided for special meetings of the Board of Directors.

Section 3. Regular meetings of the Board of Directors may be held without call or notice at such time and at such place as shall from time to time be fixed and determined by the Board of Directors.

Section 4. Special meetings of the board of Directors may be called by the President. Written notice of the time and place of special meetings shall be delivered personally to each director, or sent to each director by mail or by other form of written communication, charges prepaid, addressed to him at his address as it is shown upon the records or is not readily ascertainable, at the place in which the meetings of the Directors are regularly held. In case such notice is mailed or telegraphed, it shall be deposited in the United States mail at least forty-eight (48) hours prior to the time of the holding of the meeting. In case such notice is delivered as above provided, it shall be so delivered at least twenty-four (24) hours prior to the time of the holding of the meeting. Such mailing, telegraphing or delivery as above provided shall be due, legal and personal notice to such director.

Section 5. Notice of the time and place of holding an adjourned meeting need not be given to the absent directors if the time and place be fixed at the meeting adjourned.

Section 6. The transactions of any meeting of the Board of Directors, however called and noticed or wherever held, shall be as valid as though had at a meeting duly held after regular call and notice, if a quorum be present, and if, either before or after the meeting, each of the directors not present signs a written waiver of notice, or a consent to holding such meeting, or an approval of the minutes thereof. All such waivers, consents or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

Section 7. A majority of the authorized number of directors shall be necessary to constitute a

quorum for the transaction of business, except to adjourn as hereinafter provided. Every act or decision done or made by a majority of the directors present at a meeting duly held at which a quorum is present shall be regarded as the act of the Board of Directors, unless a greater number be required by law, or by the Articles of Organization. Any action of a majority, although not at a regularly called meeting, and the record thereof, if assented to in writing by all of the other members of the Board shall be as valid and effective in all respects as if passed by the Board in regular meeting.

Section 8. A quorum of the directors may adjourn any directors meeting to meet again at a stated day and hour; provided, however, that in the absence of a quorum, a majority of the directors present at any directors meeting, either regular or special, may adjourn from time to time until the time fixed for the next regular meeting of the Board.

ARTICLE V COMMITTEES OF DIRECTORS

Section 1. The Board of Directors may, by resolution adopted by a majority of the whole Board, designate one or more committees of the Board of Directors, each committee to consist of two or more of the directors of the corporation which, to the extent provided in the resolution, shall have and may exercise the power of the Board of Directors in the management of the business and affairs of the corporation and may have power to authorize the seal of the corporation to be affixed to all papers which may require it. Such committee or committees shall have such name or names as may be determined from time to time by the Board of Directors. The members of any such committee present at any meeting and not disqualified from voting may, whether or not they constitute a quorum, unanimously appoint another member of the Board of Directors to act at the meeting in the place of any absent or disqualified member. At meetings of such committees, a majority of the members or alternate members shall constitute a quorum for the transaction of business, and the act of a majority of the members or alternate members at any meeting at which there is a quorum shall be the act of the committee.

Section 2. The committees shall keep regular minutes of their proceedings and report the same to the Board of Directors.

Section 3. Any action required or permitted to be taken at any meeting of the Board of Directors or of any committee thereof may be taken without a meeting if a written consent thereto is signed by all members of the Board of Directors or of such committee, as the case may be, and such written consent is filed with the minutes of proceedings of the Board or committee.

ARTICLE VI COMPENSATION OF DIRECTORS

Section 1. The directors may be paid their expenses of attendance at each meeting of the Board of Directors and may be paid a fixed sum for attendance at each meeting of the Board of Directors or a stated salary as director. No such payment shall preclude any director from serving the corporation in any other capacity and receiving compensation therefor. Members of special or standing committees may be allowed like reimbursement and compensation for

attending committee meetings.

ARTICLE VII NOTICES

Section 1. Notices to directors and stockholders shall be in writing and delivered personally or mailed to the directors or stockholders at their addresses appearing on the books of the corporation. Notice by mail shall be deemed to be given at the time when the same shall be mailed. Notice to directors may also be given by telegram.

Section 2. Whenever all parties entitled to vote at any meeting, whether of directors or stockholders, consent, either by a writing on the records of the meeting or filed with the secretary, or by presence at such meeting and oral consent entered on the minutes, or by taking part in the deliberations at such meeting without objection, the doings of such meeting shall be as valid as if had at a meeting regularly called and noticed, and at such meeting any business may be transacted which is not excepted from the written consent or to the consideration of which no objection for want of notice is made at the time, and if any meeting be irregular for want of notice or of such consent, provided a quorum was present at such meeting, the proceedings of said meeting may be ratified and approved and rendered likewise valid and the irregularity or defect therein waived by a writing signed by all parties having the right to vote at such meeting; and such consent or approval of stockholders may be by proxy or attorney, but all such proxies and powers of attorney must be in writing.

Section 3. Whenever any notice whatever is required to be given under the provisions of the statutes, of the Articles of Organization or of these Bylaws, a waiver thereof in writing, signed by the person or persons entitled to said notice, whether before or after the time stated therein, shall be deemed equivalent thereto.

ARTICLE VIII OFFICERS

Section 1. The officers of the corporation shall be chosen by the Board of Directors and shall be a President, a Secretary and a Treasurer. Any person may hold two or more offices.

Section 2. The salaries and compensation of all officers of the corporation shall be fixed by the Board of Directors.

Section 3. The officers of the corporation shall hold office at the pleasure of the Board of Directors. Any officer elected or appointed by the Board of Directors may be removed at any time by the Board of Directors. Any vacancy occurring in any office of the corporation by death, resignation, removal or otherwise shall be filled by the Board of Directors.

Section 4. The President shall be the chief executive officer of the corporation and shall have active management of the business of the corporation. He shall execute on behalf of the corporation all instruments requiring such execution except to the extent the signing and execution thereof shall be expressly designated by the Board of Directors to some other officer or

agent of the corporation.

Section 5. The Secretary shall act under the direction of the President. subject to the direction of the President he shall attend all meetings of the Board of Directors and all meetings of the stockholders and record the proceedings. He shall perform like duties for the standing committees when required. He shall give, or cause to be given, notice of all meetings of the stockholders and special meetings of the Board of Directors, and shall perform such other duties as may be prescribed by the President or the Board of Directors.

Section 6. The Treasurer shall act under the direction of the President. Subject to the direction of the President he shall have custody of the corporate funds and securities and shall keep full and accurate accounts of receipts and disbursements in books belonging to the corporation and shall deposit all monies and other valuable effects in the name and to the credit of the corporation in such depositories as may be designated by the Board of Directors. He shall disburse the funds of the corporation as may be ordered by the President or the Board of Directors, taking proper vouchers for such disbursements, and shall render to the President and the Board of Directors, at its regular meetings, or when the Board of Directors so requires, an account of all his transactions as Treasurer and of the financial condition of the corporation.

Section 7. If required by the Board of Directors, he shall give the corporation a bond in such sum and with such surety or sureties as shall be satisfactory to the Board of Directors for the faithful performance of the duties of his office and for the restoration to the corporation, in case of his death, resignation, retirement or removal from office, of all books, papers, vouchers, money and other property of whatever kind in his possession or under his control belonging to the corporation.

ARTICLE IX CERTIFICATES OF STOCK

Section 1. Every stockholder shall be entitled to have a certificate signed by the President and the Treasurer, certifying the number of shares owned by him in the corporation. If the corporation shall be authorized to issue more than one class of stock or more than one series of any class, the designations, preferences and relative, participating, optional or other special rights of the various classes of stock or series thereof and the qualifications, limitations or restrictions of such rights, shall be set forth in full or summarized on the face or back of the certificate which the corporation shall issue to represent such stock.

Section 2. If a certificate is signed (a) by a transfer agent other than the corporation or its employees or (b) by a registrar other than the corporation or its employees, the signatures of the officers of the corporation may be facsimiles. In case any officer who has signed or whose facsimile signature has been placed upon a certificate shall cease to be such officer before such certificate is issued, such certificate may be issued with the same effect as though the person had not ceased to be such officer. The seal of the corporation, or a facsimile thereof, may, but need not be, affixed to certificates of stock.

Section 3. The Board of Directors may direct a new certificate or certificates to be issued in place of any certificate or certificates therefore issued by the corporation alleged to have been lost or destroyed upon the making of an affidavit of that fact by the person claiming the certificate of stock to be lost or destroyed. When authorizing such issue of a new certificate or certificates, the Board of Directors may, in its discretion and as a condition precedent to the issuance thereof, require the owner of such lost or destroyed certificate or certificates, or his legal representative, to advertise the same in such manner as it shall require and/or give the corporation a bond in such sum as it may direct as indemnity against any claim that may be made against the corporation with respect to the certificate alleged to have been lost or destroyed.

Section 4. Upon surrender to the corporation or the transfer agent of the corporation of a certificate for share duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the corporation, if it is satisfied that all provisions of the laws and regulations applicable to the corporation regarding transfer and ownership of shares have been complied with, to issue a new certificate to the person entitled thereto, cancel the old certificate and record the transaction upon its books.

Section 5. The Board of Directors may fix in advance a date not exceeding sixty (60) days nor less than ten (10) days preceding the date of any meeting of stockholders, or the date for the payment of any dividend, or the date for the allotment of rights, or the date when any change or conversion or exchange of capital stock shall go into effect, or a date in connection with obtaining the consent of stockholders for any purpose, as a record date for the determination of the stockholders entitled to notice of and to vote at any such meeting, and any adjournment thereof, or entitled to receive payment of any such dividend, or to give such consent, and in such case, such stockholders, and only such stockholders as shall be stockholders of record on the date so fixed, shall be entitled to notice of and to vote at such meeting, or any adjournment thereof, or to receive payment of such dividend, or to receive such allotment of rights, or to exercise such rights, or to give such consent, as the case may be, notwithstanding any transfer of any stock on the books of the corporation after any such record date fixed as aforesaid.

Section 6. The corporation shall be entitled to recognize the person registered on its books as the owner of shares to be the exclusive owner for all purposes including voting and dividends, and the corporation shall not be bound to recognize any equitable or other claim to or interest in such share or shares on the part of any other person, whether or not it shall have express or other notice thereof, except as otherwise provided by the laws of Massachusetts.

ARTICLE X GENERAL PROVISIONS

Section 1. Dividends upon the capital stock of the corporation, subject to the provisions of the Articles of Organization, if any, may be declared by the Board of Directors at any regular or special meeting, pursuant to law. Dividends may be paid in cash, in property or in shares of the capital stock, subject to the provisions of the Articles of Organization.

Section 2. Before payment of any dividend, there may be set aside out of any funds of the

corporation available for dividends such sum or sums as the directors from time to time, in their absolute discretion, think proper as a reserve or reserves to meet contingencies, or for equalizing dividends or for repairing or maintaining any property of the corporation or for such other purpose as the directors shall think conducive to the interest of the corporation, and the directors may modify or abolish any such reserve in the manner in which it was created.

Section 3. All checks or demands for money and notes of the corporation shall be signed by such officer or officers or such other person or persons as the Board of Directors may from time to time designate.

Section 4. The fiscal year of the corporation shall end March 31 of each year unless fixed otherwise by resolution of the Board of Directors.

Section 5. The corporation may or may not have a corporate seal, as may from time to time be determined by resolution of the Board of Directors. If a corporate seal is adopted, it shall have inscribed thereon the name of the corporation and the words "Corporate Seal" and "Massachusetts." The seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any manner reproduced.

ARTICLE XI INDEMNIFICATION

Every person who was or is a party or is threatened to be made a party to or is involved in any action, suitor proceeding, whether civil, criminal, administrative or investigative, by reason of the fact that he or a person of whom he is the legal representative is or was a director or officer of the corporation or is or was serving at the request of the corporation or for its benefit as a director or officer of another corporation, or as its representative in a partnership, joint venture, trust or other enterprise, shall be indemnified and held harmless to the fullest extent legally permissible under the law of the Commonwealth of Massachusetts from time to time against all expenses, liability and loss (including attorneys' fees, judgments, fines and amounts paid or to be paid in settlement) reasonably incurred or suffered by him in connection therewith. The expenses of officers and directors incurred in defending a civil or criminal action, suit or proceeding must be paid by the corporation as they are incurred and in advance of the final disposition of the action, suit or proceeding upon receipt of an undertaking by or on behalf of the director or officer to repay the amount if it is ultimately determined by a court of competent jurisdiction that he is not entitled to be indemnified by the corporation. Such right of indemnification shall be a contract right which may be enforced in any manner desired by such person. Such right of indemnification shall not be exclusive of any other right which such directors, officers or representatives may have or hereafter acquire and, without limiting the generality of such statement, they shall be entitled to their respective rights of indemnification under any bylaw, agreement, vote of stockholders, provision of law or otherwise, as well as their rights under this Article.

The Board of Directors may cause the corporation to purchase and maintain insurance on behalf of any person who is or was a director or officer of the corporation or is or was serving at the request of the corporation as a director or officer of another corporation, or as its representative

in a partnership, joint venture, trust or other enterprise against any liability asserted against such person and incurred in any such capacity or arising out of such status, whether or not the corporation would have the power to indemnify such person.

The Board of Directors may from time to time adopt further Bylaws with respect to indemnification and may amend these and such Bylaws to provide at all times the fullest indemnification permitted by the law of the Commonwealth of Massachusetts.

ARTICLE XII AMENDMENTS

Section 1. The Bylaws may be amended by a majority vote of all the stock issued and outstanding and entitled to vote at any annual or special meeting of the stockholders, provided notice of intention to amend shall have been contained in the notice of the meeting.

Section 2. The Board of Directors by a majority vote of the whole Board at any meeting may amend these bylaws, including Bylaws adopted by the stockholders, but the stockholders may from time to time specify particular provisions of the Bylaws which shall not be amended by the Board of Directors.

###

APPROVED AND ADOPTED
05/20/25

Shanel Lindsay
Shanel Lindsay, Owner

Plan for Insurance Acumen Collective LLC

March 27, 2025

Plan for insurance is to provide general liability and insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually and vehicle liability insurance coverage for no less than \$1,000,000 per occurrence single limit 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 shall be no higher than \$5,000 per occurrence and will be activated by an insurer before being granted a final license by the Commission.

Delivery vehicles shall carry liability insurance in an amount not less than \$1,000,000 combined single limit.

935 CMR 500.145(4); 935 CMR 500.101(2); 935 CMR 500.105(10)

Acumen Collective LLC

Business Plan - Courier Delivery

Executive Summary

- Massachusetts registered home delivery service “Marijuana Delivery Courier.”
- Providing home delivery services to Massachusetts consumers 21+ from a licensed retail.
- **Company** is grant funded and will require approximately **\$20,000** for start up
- Investment will be used to fund capital costs, startup expenses, including licensing and permitting.

Our Company is a Social Equity, Woman, and Minority-owned Massachusetts-registered Corporation, established to achieve the legal home delivery of cannabis products from a retail cannabis dispensary. Our company operations will take place throughout the state, as with all home delivery company, with corporate operations offices located in the City of Northampton as a low cost entry point into the market. Delivery operations will occur at a location to be determined but discussions with retailers indicate that they desire to engage with a Courier that is already at Final license. Therefore, we will reach Final license in Northampton and with a third-party agreement with a retailer, our additional operations outside of corporate operations will be established. When a retailer engages, we will secure an HCA or HCA waiver in that municipality if we store vehicles and perform operations from said municipality. No HCA's will be secured from delivery destination zip codes. A waiver is not always guaranteed but we are confident that with a Final license, and an agreement to provide compliant delivery for a retail, the town officials will regard this HCA or HCA waiver as fulfilling their Municipal Equity plan to encourage Social Equity licensees entering the cannabis industry. All vehicles will be equipped, stored, and operated in full compliance with all state and local regulations.

Risks: We intend to start with a single vehicle, have retail employees work as badged volunteers for the delivery company, and only charge a fee to the retailer for our service.

Competition

Direct Competition

The direct competition will be other delivery and retail businesses. The purpose of our Company is to build a stable business delivering for one retail, at which time it will expand to other retails.

Competitive Advantages

- Grant-financed start up with opportunity for future grants
- Extensive compliance experience
- Courier is the lowest bar to entry

Strategy and Execution

Marketing Strategy

Direct marketing through our retail drivers – As the main thrust of our marketing efforts is to build a brand and product loyalty relationship with end-users, our marketing and sales efforts must work hand in hand. We will engage our client-base personally with a range of marketing collateral that includes, but is not limited to, product information leaflets, safe product use information, advertising posters, product displays, and social media engagement. We will establish marketing partnerships through workshops, presentations, and mutually beneficial training seminars that further strengthen our brand.

State, regional, and locally focused advertising and advertorials – The Massachusetts regulations regarding cannabis advertisements through print advertising, online advertising, sponsorship and more, present many challenges. These challenges are further exacerbated by the unwillingness of players like Facebook and Google to allow paid, cannabis-related advertisements across their medium. Federal laws that currently prohibit the sale of cannabis products across state lines devalue any need for brand-building beyond adjoining state borders in the short term.

As long as the principal market for our immediate future lies within the state of Massachusetts and surrounding states, this is where the main thrust of our advertising opportunities lie. While there are numerous national cannabis advertising lacking for the more discerning or sophisticated demographic,

Price point - While price is rarely the most important factor affecting buying behavior, it should strive to achieve parity with the customer's perceived value of the product. All pricing will ultimately be determined by economic and marketplace conditions, not least those driven by competitors and their pricing models. Nonetheless, cannabis products enjoy – in no small degree – the benefits of commodity values. Most vendors have a good idea of the fair market price for cannabis products, as do the majority of current consumers. Our target market users will seek out, or be attracted to, a product that offers quality and value.

Promotion - The Brand and products will be promoted through the following means:

Branding through website, multi-level marketed efforts, and word of mouth. Primarily, the company will serve the existing retail customers.

Direct advertising – The most straightforward and unfettered means of advertising to current and prospective customers is through direct advertising in the form of e-mail, electronic newsletters, social media and the like. Using branded marketing collateral (available from our retail sellers) in product packages, on websites, and social media, current and prospective customers will be invited to participate in our program of community campaigns and events.

Customer Service Excellence - Our Company must engage our customers with superlative customer service. It is essential that each member of staff knows our products well, can speak to our brand ethos, and understands customer needs and expectations both on the back end and in person. The entire team must strive to act as individual brand ambassadors at all times.

Sales and Marketing Relationship: As a delivery courier of cannabis products **we are** compelled to approach the sales and marketing challenge with firm intent. We must strive to successfully engage our target market groups in a manner that facilitates sales by creating the desire to purchase among the end-user audience. Retail customers will learn about our service range and will be enticed to select courier services above others through the activities mentioned above. End-users will view **us** as a responsible, mindful supplier of high-quality cannabis products that meets their consumption needs.

Marketing Objectives: To persuade consumers that our brand represents qualities and features that they desire.

Market Channels - Retail sales of cannabis are strictly limited to licensed retail outlets, dispensaries and, in the future, cannabis cafes and smoke clubs as well as delivery. The location, presence, and licensing status of these establishments are publicly available through a single online source. Regulations effectively preclude opportunities for online purchases as the transportation of cannabis products is strictly regulated. Similarly, home delivery licenses are not yet permitted. (*Company*) will sell its products solely through our licensed retail delivery cannabis establishment.

Community informational activities –

- Persuade consumers that our delivery and retailer’s product fit well with their consumption patterns, lifestyle and self-image.
- Engage consumers in our community supportive marketing efforts.
- Satisfy and exceed customer service expectations.

Management and Staff

The proper management of all aspects of the proposed project is crucial to the success of our company. We will bring together a diverse team that offers the direct experience and knowledge to achieve both our business and community goals.

Founder: Shanel Lindsay

Shanel Lindsay is an attorney, advocate and serial entrepreneur. In addition to serving as Parabola Center’s Entrepreneur Director, Shanel is Founder and CEO of Ardent Life Inc., a global cannabis hardware and CPG company. Shanel was an author of Question 4, the ballot initiative to legalize adult use cannabis in Massachusetts. Subsequently, she was appointed to the Massachusetts Cannabis Advisory Board, serving from 2017-2021. Shanel is also co-founder of the grassroots advocacy group Equitable Opportunities Now.

Personnel plan

Making allowances for sickness, personal days, vacations, and the like, we anticipate 2 full-time employee with salaries ranging from \$30,000 to \$60,000 per annum, and hourly staff wages starting \$20 per hour. We feel that a living wage will help build and solidify a team that is inspired to contribute to the success of our company and the state of Massachusetts.

Financials

Financial Assumptions

The appended pro forma financial statements are based upon the following financial assumptions:

- \$250 in delivery sales per day
- One retail shown so scaling up to more retails will provide this net at each retail location

Financial Snapshot:

Key Financials	Year 1
Retail Delivery Sales agreement: \$5000/mo plus 10% of sales	69,125
Total COGS	34,281
subtotal	34,844
Income Tax @30%	10,271
Estimated net income	\$25,564

Maintenance of Financial Records Plan

Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request. All financial records will be maintained in accordance with generally accepted accounting principles. Our company will maintain the following written records that are required and subject to inspection:

- 1.1.1. The company will maintain business financial records, which shall include manual or computerized records of:
 - 1.1.1.1. Assets and liabilities.
 - 1.1.1.2. Monetary transactions.
 - 1.1.1.3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers
 - 1.1.1.4. Sales records including the quantity, form, and cost of marijuana products; and
 - 1.1.1.5. Inventory records as required by 935 CMR 500.105(8) and as outlined in the General Record Keeping section of our standard operating procedures.
- 1.2. The company shall fully comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- 1.3. Our point of sale systems and software are configured to separate accounting practices for marijuana products from non-marijuana products.
- 1.4. Our Marijuana Delivery Operator establishment (MDO) is not co-located with a medical dispensary and has no obligation to maintain an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10) and 935 CMR 500.140(6).
 - 1.4.1. General
 - 1.4.1.1. We are prohibited from utilizing software or other methods to manipulate or alter sales data.
 - 1.4.1.2. We will conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data.
 - 1.4.1.3. A record that this monthly analysis has been performed shall be maintained by us and made available to the Commission upon request.
 - 1.4.1.4. Should such analysis determine that software or other methods have been installed or utilized to manipulate or alter sales date, Senior management will immediately disclose this information to the Commission, and cooperate in any investigation, and take such other action directed by the Commission.
 - 1.4.2. Inventory records include:
 - 1.4.2.1. Shipping manifests

- 1.4.2.2. Delivery and unpacking video recordings
- 1.4.2.3. Daily sales stock withdrawal and return reports
- 1.4.2.4. Weekly inventory reports
- 1.4.2.5. Product return reports
- 1.4.3. Salary and wages paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- 1.4.4. All financial transactions and accounts will be entered into a proprietary accounting software by a bookkeeper specifically employed for the purpose.
- 1.4.5. The accounting software used will provide security and backup capabilities in accordance with 935 CMR 500.000 and the company security plan.
- 1.4.6. Daily sales reports will be generated by the bookkeeper and stored both digitally and as a hard copy in the records cabinet.
- 1.4.7. The accounts will be reviewed monthly by a licensed CPA.
- 1.4.8. The point of sale system software will automatically transfer all sales transactions to our accounting system for reconciliation by the bookkeeper.
- 1.4.9. The warehouse manager will generate a sales report from the point of sale system at the conclusion of each day. This report should be digitized and a hard copy stored in the records cabinet
- 1.4.10. Expense records
 - 1.4.10.1. warehouse managers and senior management may be provided with a company debit card and/or check-signing authorization. A receipt must be obtained and presented to the bookkeeper for all expenses paid through these means
 - 1.4.10.2. Documentation supporting business expenses such as statements and invoices, details of cash payments, receipts and the like must be securely stored in the records cabinet and presented to the bookkeeper for entry into the accounting software.
- 1.4.11. Contracts and Agreements – the company will likely enter into a number of contracts and agreements with the host municipality, service providers, financial institutions, property owners etc. Such contracts and agreements include, but are not limited to;
 - Sales and Purchase agreements
 - Loan agreements
 - Rental agreements
 - Lease agreements
 - Franchise agreements
 - Sale and lease back agreements
 - Trading agreements with suppliers
 - Insurance policies
 - Legal documentation
 All such documentation must be digitized and a hard copy stored in the records cabinet.

- 1.4.12. Other documents may include;
- Deposits with utility companies
 - Contracts with telecommunications companies
 - Business registration documents and certificates
 - Business licensing documents
 - Surety bonds
 - Tax records

All such documentation must be digitized and a hard copy stored in the records cabinet.

Personnel Policies: Delivery Company

Personnel Records of our Marijuana Establishment must be available for inspection by the Commission, on request. Personnel records shall be securely and confidentially maintained in either a password-protected electronic format, or in a locked, secured storage space if in physical format. These personnel records shall include:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the marijuana establishment and shall include, at a minimum, the following:
 - a. All materials submitted to the commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - d. 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;
 - e. Documentation of periodic performance evaluations;
 - f. A record of any disciplinary action taken; and
 - g. Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe operations conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

SUMMARY PERSONNEL POLICIES

Company shall comply with the US Department of Labor's Fair Labor Standards Act and any other local, State, or Federal laws and regulations.

PRIORITY HIRING & PROMOTIONS: Company will grant priority hiring status to established Massachusetts residents, particularly those residing in ADIs and the host municipality, and will be working to provide job opportunities to those demographics specifically stated by the Commission in the regulations as areas of disproportionate impact and as detailed in the Company Positive Impact Plan and the Diversity Plan. Company shall give priority application status for new hires, as well as priority status for company promotions, to applicants & employees from those listed demographics, however, these factors shall not be determinative and shall not prevent the Company from hiring the most qualified applicants and complying with all Massachusetts anti-discrimination and employment laws.

ACCOMODATIONS FOR DIFFERING ABILITIES: Company is committed to complying with or exceeding expectations in the Americans with Disabilities Act and any local, state, and federal laws prohibiting discrimination in employment against qualified individuals with differing abilities. The Company will strive to provide reasonable accommodations requested by any employee with a disability who is otherwise able to perform essential functions of their job, or to provide adequate alternative accommodations (so long as that accommodation does not result in undue hardship on the Company, or pose a threat to the health and/or safety of the employee or coworkers).

STATE REGISTRATION of MARIJUANA ESTABLISHMENT AGENTS: All employees of Company shall meet suitability requirements outlined in the State regulations, including all background checks and CORI as required by the Commission, and shall before employment start date be registered as a Marijuana Establishment Agent. All agent registrations shall be renewed annually. No employee shall be permitted to work without having a valid Agent Registration Card.

COMPANY TRAINING: All registered marijuana establishment agents under Company employ will be required to complete all necessary trainings related to job functions prior to beginning work on the floor, and training shall be tailored to the roles & responsibilities of each specific job function. At time of hire all employees will be required attend a company orientation to cover all aspects of the employee operations, individual employee expectations, details on security and compliance, and will receive on-site facility training for specific positions. Company employees will be required to receive training, which will include important Company operational information and procedures, as well as a core-curriculum of Cannabis Education seminars tailored toward creating a safe, compliant facility with the most knowledgeable staff in the MA cannabis industry. All employees will receive a minimum of 8 hours of on-going training annually to remain current with all advancements in State regulations, SOR policy, cannabis science and the evolving market, facility operations, and job site safety.

STATE CERTIFICATIONS: Employees will be required to undergo and pass any & all State-mandated certification training classes for job safety and equipment operation, and where applicable, will undergo state certifications for the safe handling of food and/or the application of fertilizers and pesticides, and will maintain annual trainings and re-certifications.

RESPONSIBLE VENDOR TRAINING: All owners, managers, and employees will be required to successfully complete such training. All new hires will be required to attend and successfully complete the Responsible Vendor Training, in compliance with the "Certification Training Program Standards" and to include at minimum the "Certification Training Class Core Curriculum" within 90 days of start date, and all employees will be required to attend and successfully complete the Responsible Vendor Training on a yearly basis thereafter.

UNIFORMS & ID BADGES: All registered agent employees will wear clearly identifiable Company uniforms if available during all shifts, and will be required to wear a photo-ID agent

badge at all times while on shift. All employees will also be required to be in possession of the State-issued Agent Registration Card at all times while on shift. Uniforms shall be kept clean and generally free from wrinkles, stains, rips or tears. When not on shift, employees should make a best-faith effort to keep all uniforms and agent badges securely stored so as to prevent theft; loss or theft of any uniform or badges shall be reported to Company management immediately, and an Incident Report will be filed with the CCC.

Uniforms or any other clothing bearing the Company logo shall not be worn in public outside of the facility or other lawful event except for the actual time it takes the employee to travel to and from their work shift and in which case the uniform must be sufficiently covered to fully conceal any Company logos.

EMPLOYEE SAFETY: All employees shall be sufficiently trained at hire in all State-mandated safety protocol and/or the operation of any equipment and machinery as is related to job functions, and will receive annual update trainings. Facility shall be designed and safety procedures implemented to prevent employee injury or unnecessary employee strain that may lead to injury. It is the responsibility of each employee to conduct all tasks in a safe and efficient manner complying with all safety and health regulations and any other specific job-related safety concerns. Employees are required to report any accident, job-related injury, or any other such incident to their supervisor immediately. Engaging in any behavior that fails to comply with company safety policies or any laws and regulations, and/or that directly or indirectly causes hazardous conditions or otherwise places persons or property at risk, shall be subject to immediate Corrective Action.

PERSONAL HYGIENE & CLEANLINESS: All Company employees will be required to maintain a sufficient level of personal hygiene and cleanliness so as not to compromise the safety and quality of the cannabis products worked with. All employees will be required to conform to certain sanitary practices while on duty including but not limited to washing hands thoroughly and sanitizing prior to starting work and at any time that hands may become contaminated. Employees will be encouraged to use best practices to limit personal contamination of cannabis products. Employees should appear presentable and ready to represent Company professionally to our guests.

PUNCTUALITY & ATTENDANCE: All Company employees will be required to arrive for their shifts on-time and as scheduled, in uniform and with all required identification, and work all shifts as scheduled. Staff schedules can be flexible and tailor-arranged with management as needed, but staff will be expected to work weekdays, weekends, and some holidays. Eligible employees will receive benefits of Vacation Time, Medical Leave, and Personal Days. Employees will be required to coordinate in advance with scheduling Management to formally request a specific day(s) off or for vacation time. Periods of extended leave for medical or other personal reasons shall be coordinated between the employee, scheduling Management, and the Human Resources department. Sick time may be used at any time in the case of an emergency or sudden onset of illness. Any absences due to illness or injury that qualify under the Family and Medical Leave Act shall not count against the employee's attendance (medical documentation may be required).

Patterns or excessive occurrences of absenteeism or tardiness may result in Corrective Action. Failure to appear for a scheduled shift without prior arrangement or calling-in to report the absenteeism shall be considered a “No-Call No-Show” and will result in immediate Corrective Action, including possible termination. Three consecutive shifts of No-Call No-Show shall be considered job abandonment and the employee’s voluntary resignation of employment.

CELL PHONES: Cell Phones will be permitted within the Company facility. All employees will be required to maintain responsibility for phones on person, stored in employee lockers or in the employee’s vehicle. At absolutely no time may pictures, video, live streams, or any other such recording be taken of the interior workings of the facility where cannabis is stored, dispensed, or otherwise handled.

PROFESSIONALISM: Company expects respectful communication, cooperation, teamwork, and full participation from all employees. Every employee will have the responsibility to treat others with dignity and respect at all times, and for that level of professionalism to be exhibited during all work hours, at work functions, at industry events, and at any other time that the employee may be directly or indirectly representing the Company. Employees are prohibited from making public statements about Company, Company Policy, Management, other employees, customers, or any other licensed cannabis establishment that is derogatory or defamatory in nature. This policy applies to any employee’s Social Media posts.

Company is committed to cultivating a culture of diversity and inclusion in the Cannabis Industry. We will hold a Zero-Tolerance policy for behavior that is considered discriminatory or bullying based on Race, Nationality, Religion, Gender, Identity, Sexual Orientation, Age, or Differing Ability. Company will hold a Zero-Tolerance policy for behavior that is considered Sexual Harassment or Assault. Company has a Zero-Tolerance policy for any work-place Violence or threat of violence toward other employees, vendors, and/or customers. Any employee positively identified in the engagement of any such behaviors shall be subject to immediate Corrective Action, including potential termination of employment.

EMPLOYEE RELATIONSHIPS: Company employees will be required to adhere to a strict code of conduct regarding inter-personal relationships while on shift, providing for a work environment where employees maintain clear boundaries between personal and business interactions in order to effectively conduct all job functions and enhance productivity. While nothing in this policy prevents friendships or romantic relationships between co-workers, or the hiring of immediate family members, employees in managerial roles may present a Conflict of Interest if romantically involved with or immediately related to any employee under which there is a direct-reporting relationship. No part of this policy shall preclude or interfere with the rights of employees protected by the National Labor Relations Act or any other applicable statute.

CONFLICTS OF INTEREST: Company employees shall be permitted to be gainfully employed in addition to and outside of Company so long as there is not Conflict of Interest, such as but not limited to:

- Employment with or Consultant to a Company competitor or potential competitor, supplier, or contactor;

- Serving as a Board member for another licensed Cannabis establishment;
- Owning or having controlling interest in any other licensed Cannabis establishment or in any company actively pursuing State licensing for a Cannabis establishment;
- Working for, consulting for, or serving as a Board member for any company involved with the State Responsible Vendor Program;
- Any other position or activity that may impair, or seem to impair, the employee's ability to make objective and fair decisions when performing their jobs.

No employee shall accept any gifts, discounts, services, or favors from any customer, supplier, vendor, or competitor unless such promotion was made available to all Company employees and as authorized by Management.

SOCIAL MEDIA: Employees are asked to keep their professional and personal lives as separate as possible in regards to public Social Media postings, and to exercise caution when sharing any information related to the Company. Employees may share official Company Social Media posts or links to the Company website, but are prohibited from making any social media posts that make statements implying the individual speaks on behalf of or in any other way claims to represent Company without express authorization by the Company. Employees may not post, comment, or otherwise publicly speak to any Company prices, policy, plan, protocol, or procedure. Any post made about any Company product or other job-related matters must expressly state that it is the employee's sole opinion and does not represent the views of the Company. Employees are expressly prohibited from sharing any photos, videos, live streams, or any other such recording of any part of the facility or cannabis plants or products in any stage of processing or manufacturing, storage, or distribution. Employees are expressly prohibited from sharing any photos, videos, live streams, or any other such recording where the employee or any other person is shown to be wearing the Company Uniform and/or ID badge. Employees are expected to extend their behavior outlined in the above section "Professionalism" to their social media interactions with other employees, customers, industry acquaintances, and other MA cannabis establishments or their agents.

WEAPONS BAN: No Company employee may carry on their person while at work any weapons of any kind. State law expressly prohibits any registered cannabis agent from carrying a firearm while on shift or from having a firearm on premises or in any transport vehicle. Company has a zero-tolerance policy for carrying concealed weapons and evidence of such shall result in immediate Corrective Action, which may include termination of employment.

SMOKE, DRUG, & ALCOHOL -FREE WORKPLACE: All of the Company facilities and properties will be a Smoke, Drug, and Alcohol -free workplace. No employee shall be permitted to consume any marijuana or marijuana product, alcohol, or tobacco products while on the premises, or off-site prior to or during their work shift. The use of tobacco on the premises will result in Corrective Action; Consuming cannabis or alcohol on the premises, either before, during, or after the work shift, or off shift, will result in immediate dismissal. Company reserves the right to request any employee Drug Screening for illicit substances.

CORRECTIVE ACTION: All employees are expected to understand and abide by all Company rules and policies, and to perform their job functions to the standards and expectations set forth in the job description. Company will implement the use of progressive Corrective Action to address issues of poor job performance and/or misconduct designed to provide a process to improve and prevent the recurrence of the undesired performance or conduct. The Corrective Action plan will consist of multiple steps; however, the Company may combine or skip steps based on the facts of each situation, the nature/severity of the offense, and the employee's history of corrective action:

1. Verbal Warning(s)
2. Written Warning(s)
3. Final Written Warning
4. Suspension without Pay
5. Termination of Employment

Steps for Corrective Action may be carried out by authorized Management and/or Human Resources officer as applicable.

CAUSE FOR IMMEDIATE DISMISSAL: All new hires will be instructed on Security protocol and grounds for immediate dismissal in the Company Orientation, and it will be detailed in the Employee Handbook. All employees will be required to sign documentation that they have been made aware of these conditions. Employees shall be subject to immediate dismissal in the event of:

- Consuming unsanctioned marijuana, alcohol, or other drugs on premises, either on or off shift.
- Arriving to work impaired by marijuana, alcohol, or other drugs, whether or not consumption took place off premises.
- Involvement in the Diversion of Marijuana or Marijuana Products from Company, or in the manipulation of inventory records, tracking software, or product labeling/packaging with the intent on diverting marijuana or marijuana products, which shall be reported to the Commission and to Law Enforcement.
- Engagement in unsafe practices with regard to the operation of the establishment and/or employee safety, which shall be reported to the Commission.
- Behavior that poses immediate risk to the personal safety of, or which may be considered malicious harassment, discrimination, violence, or threat toward, or any unsolicited sexual advances or assault on, any other Company employee(s) or customer(s), which shall be reported to the Commission and, in the case of a criminal act, to local Law Enforcement.
- Conviction or guilty plea in the case of felony drug offense involving distribution of controlled substances, or in the transport of any controlled substance and/or alcohol to a person under 21 years of age.
- Carrying a firearm while on shift.
- Evidence of theft of or unauthorized possession of any company property or the property of other employees/customers.
- Evidence of Theft of Hours, falsified timesheets, or alteration of any other legal document for the purposes of defrauding the Company

Recordkeeping procedures

- i. Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request.
- ii. The following business records shall be properly maintained:
 1. Assets and liabilities;
 2. Monetary transactions
 3. Books of accounts;
 4. Sales records; and
 5. Salary and wages paid to each employee.
- iii. The company will maintain these and the following written records that are required and subject to inspection, as well as any additional documentation that it may be directed to record by the Commission:
- iv. **Written Operating Procedures** as required by 935 CMR 500.105 (1) The duty manager has copies of the company operating procedures.
 - a. It is the responsibility of all employees to carefully read, understand and follow these operating procedures.
 - b. All employees are responsible for ensuring that these operating procedures are followed.
 - c. Any deviation from standard operating procedures must be authorized by the duty manager or your immediate supervisor.
 - d. These operating procedures will be revised from time-to-time and minor adjustments will likely be made. All revisions will be carefully noted and the operating procedures manual updated.
 - e. Any material changes will be communicated to the Commission
 - f. Inventory records as required by 935 CMR 500.105(8);
- v. **Inventory records include:**
 - a. Shipping manifests
 - b. Delivery Manifests
 - c. Delivery and unpacking video recordings
 - d. Daily sales stock withdrawal and return reports
 - e. Weekly inventory reports
 - f. Product return reports
 2. Shipping manifests - All deliveries will be accompanied by a shipping manifest. Once this document has been used to verify the shipment it must be scanned for digital storage and the original placed in the appropriate ring binder and stored in the records cabinet.
 3. Delivery and unpacking video recordings - All deliveries will be recorded using a hand-held video recorder. These recordings will be transferred to digital storage medium, clearly labelled with the date and manifest number(s) and stored in the records cabinet. Any and all

variances from the manifest must be reported in accordance with standard operating procedures.

4. Daily sales stock withdrawal and return reports - Each day, items will be removed from the main storage vault and placed in the counter area for sale. These items will be carefully recorded at the time of withdrawal. Unsold sales stock will be recorded on the same sheet when returned to the storage vault each evening.
 - a. If, during the course of the day, additional items must be withdrawn from the storage vault, they too will be added to the withdrawal report and accounted for upon the return of sales stock to the storage vault.
 - b. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.
5. Weekly inventory reports - Each week, the duty manager, together with another licensed employee will conduct an inventory of all goods in the storage vault. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.
6. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
7. The company uses a proprietary Seed-to-sale tracking software that allows cultivators, manufacturers, retailers, the Commission and others to quickly and easily track marijuana and marijuana products from propagation to sale.
8. Our establishment receives marijuana, and marijuana products in pre-packed, shelf-ready packaging.
9. Once goods are delivered and manifests verified, all products - each individual unit for sale - must be entered into the Seed-to-sale tracking software in order to maintain an unbroken chain of custody.
10. All goods pertaining to a specific manifest will be entered into the system as a batch. Where applicable, a report pertaining to these items will be generated on the seed-to-sale software, printed out, and securely attached to the manifest and stored in accordance with section 2 (b) of this operating procedure.

vi. **Personnel records:**

1. All personnel files are to be stored in the records cabinet
2. The employee handbook contains a job description for each employee and volunteer position in the company. A signed copy of the relevant job description for each employee will also be kept in the individual personnel record of each employee.

3. The company organizational chart will be clearly posted in the office area but may also be found the operations manual and employee handbook.
4. A personnel record for each marijuana establishment agent shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. documentation of verification of references; the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - c. 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;
 - d. documentation of periodic performance evaluations;
 - e. a record of any disciplinary action taken.
 - f. notice of completed responsible vendor and eight-hour related duty training.
 - g. records of any health and safety related incidents
5. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions for the current and following week will be clearly posted in the office area. A copy of each staffing plan will be stored for future reference in the appropriate ring binder in the records cabinet.

vii. Personnel policies and procedures

1. All personnel policies and procedures are clearly outlined in the employee handbook, a copy of which is available to all employees.
2. Certain specialized procedures are contained in the security plan.
3. All new employees will be required to read the employee handbook and security plan, undergo basic security training and sign a document acknowledging receipt of each and all of these elements. This acknowledgement will be stored with their individual personnel record.
4. All personnel files are to be stored in the records cabinet
5. All employees will be subject to a state-mandated background check. Background check reports obtained in accordance with 935 CMR 500.030 will be digitized and a hard copy placed into the individual personnel records
6. All records of waste disposal must be maintained pursuant to 935 CMR 500.105(12).
7. All waste records should be maintained for at least three years.

8. In the course of normal operations small amounts of marijuana waste may be generated from (for example) broken packaging, or customer returns. All marijuana waste must be disposed of in accordance with 935 CMR 500.105 (12).
9. All marijuana waste will be placed in a ziplock bag and deposited into the locked disposal container for inventory at the end of the day. Each item for disposal must be weighed, recorded, and entered into the inventory reconciliation report in accordance with the company's security plan.
10. The items disposed of and recorded in the inventory reconciliation report must also be entered in the Metrc seed-to-sale tracking software to ensure the completion of an unbroken chain of custody.
11. At least two licensed marijuana agents must witness and document this process.
12. Such documentation shall be retained for a minimum of three years or longer if so directed by the Commission.

viii. Security Device Log

1. The issue and return of all security devices such as swipe cards, keys, codes and combinations must be noted in the security device log.
 2. Employees acknowledge the receipt or return of such devices by signing this log.
 3. Recording the issue and return of all security devices is the responsibility of the duty manager or senior management as required in the security plan.
 4. The issue of security devices may only be authorized by the duty manager or senior management as required in the security plan.
 5. The issue of codes and combinations is acknowledged by signing the relevant entry in the security device log. On NO account may the actual code or combination be noted or written down, either in the security device log or elsewhere. See the security plan for additional details.
- ix. Following closure of a Marijuana Establishment, all records will be kept for at least two years at the expense of our Marijuana Establishment and in a form and location acceptable to the Commission.

Plan to Restrict Access to 21 or Older

Restricting Access to age 21 and older

In accordance with 935 CMR 500.029 and 500.002, this policy affirms that no person under the age of 21 will be permitted entry or employment, with strict ID checks enforced for all entries.

1. All employees and registered agents must be 21 years of age or older.
2. All visitors must be 21 years of age or older.
 - a. All consumers, visitors, employees, and agents must be **21 years or older** to enter the premises. There are **no exceptions** unless the establishment becomes co-located with a Medical Marijuana Treatment Center, in which case the provisions in 935 CMR 500.140(3) apply.
3. In accordance with 935 CMR 500.110 (1) (a) and 935 CMR 500.105 (14), **NO** person may enter our premises without first producing a valid, state or federal, photo ID.
4. Valid ID must be presented to the Duty Manager prior to entering the facility, and at the Point of Sale for data-entry purposes.
5. No person under 21 years of age may enter the premises. There are **NO** exceptions to this rule.
6. Loitering, in accordance with 935 CMR 500.110 (1) (b) is not permitted under any circumstances. Any person suspected of loitering should be politely questioned by a member of staff and, if unable to credibly account for their presence, be asked to leave the vicinity. Should the person refuse, the matter should be elevated to the Operations Manager who may, if necessary, contact local law enforcement for assistance in removing the person from the facility.
7. All cannabis waste will be rendered unusable and safely disposed of as outlined in **Cannabis Waste Disposal Procedures**, above.
8. All access to cannabis product will be strictly controlled and monitored as outlined in **Prevention of Diversion**, above.

Co-located Facility Provision:

In the event that the facility becomes co-located with a Medical Marijuana Treatment Center:

- Individuals 18+ with a valid medical registration card may be admitted.
- Individuals under 18 may only enter if accompanied by a personal caregiver who also holds a valid registration card.
- All such individuals must also provide a valid government-issued photo ID in accordance with 935 CMR 500.140(3).

NO customer may enter our production premises without first presenting a valid, recognized, photo ID to the Duty Manager. Valid ID must be shown before entering the facility and at the Point of Sale for data-entry purposes.

There are NO EXCEPTIONS, and NO EXCUSES to this rule.

Acumen Collective LLC

Diversity Plan

Introduction

Our purpose is to support people of color, veterans, women, disabled individuals, and LGBTQ+ residents of the Commonwealth in order to stop the continuation of an inequitable status quo in the workplace. To do so, we intend to teach the importance of ownership, build community between diverse groups and neighboring organizations, and provide job opportunities to diverse groups, with a variety of responsibilities, that will build an efficient and robust operation all Massachusetts residents can be proud of.

To the extent permissible by law, it is the policy of this company to prioritize hiring and community engagement and support among the following demographic groups:

1. People of color
2. Women
3. Veterans
4. People with disabilities
5. People who identify as LGBTQ+

The execution of this plan will be documented and reviewed annually. The outcome of this review will be provided by our company to the Commission prior to the annual renewal of our license.

Any action taken, or programs instituted, by our company for the execution of this plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

This plan 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 Marijuana Establishments.

Goals

1. Employing 40% women, 20% people of color, 10% LGBTQ+ members, 10% veterans, and 10% those with disabilities.
2. Engage with at least two diverse suppliers per year, including women-, veteran-, minority-, LGBTQ+-, or disability-owned businesses.

3. An employee promotion goal wherein at least 50% of the employees who receive promotions within our first year of operations are of the above-listed groups.

Programs

The following programs will help effectuate the above goals:

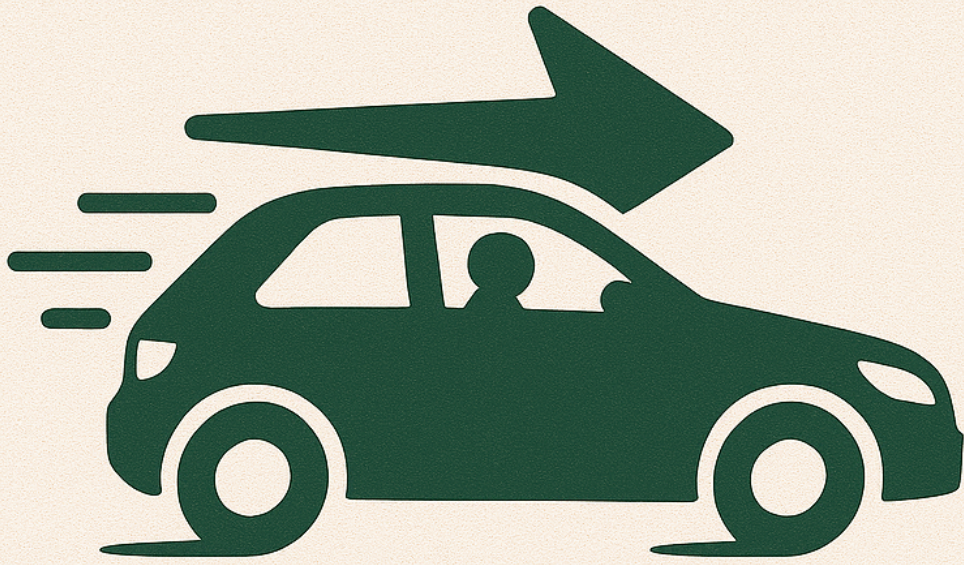
1. Employment opportunities- when available- will be published no less frequently than annually on Indeed.com, LinkedIn, or in the Boston Globe, with the objective of reaching, women, veterans, people of color, LGBTQ+ members, and those with disabilities. Job postings will be published at least quarterly via Indeed, LinkedIn, and through outreach to organizations such as the Massachusetts LGBT Chamber of Commerce, MassHire, Urban League, and community-based organizations in ADIs.
2. Commit to training diverse staff in management roles to fulfill the goal of promoting diverse staff to management positions. We will review the SDO supplier list and CCC directories quarterly and attend equity-related cannabis networking events to identify qualified vendors and contractors.
3. Utilize the SDO supplier list to proactively engage with women, veteran, minority, LGBTQ+ member, and disabled-owned suppliers.
4. Promotion and Retention
 - a. Diverse employees will receive quarterly management training on supervisory skills, SOP compliance, and leadership development.
 - b. We will conduct biannual performance reviews to identify candidates for internal promotion with a goal that 50% of promotions annually come from the identified groups.

Measurement:

We intend to focus our efforts on the following metrics:

1. Have we advertised available positions on Indeed.com and/or other sources with the objective of more effectively reaching women, veterans, people of color, LGBTQ+ members, and those with disabilities?
2. We will contract with at least two diverse suppliers annually, using SDO and CCC lists, and track expenditures with each partner.
3. Have any employees advanced their job roles since hiring, trained with more advanced personnel, or brought on diverse employees in their network which has increased company or management diversity with 50% of promotions being diverse employees?

4. Have we engaged with diverse suppliers, including at least 2 businesses owned by women, veterans, people of color, LGBTQ+ members, and disabled individuals, as part of our supplier diversity goal?



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