



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284113
Original Issued Date: 06/17/2021
Issued Date: 06/17/2021
Expiration Date: 06/17/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Advesa MA, Inc.

Phone Number: 860-992-2374
Email Address: jessica@gomjco.com

Business Address 1: 966 Cambridge St. Business Address 2:
Business City: Cambridge Business State: MA Business Zip Code: 02141
Mailing Address 1: 966 Cambridge St. Mailing Address 2:
Mailing City: Cambridge Mailing State: MA Mailing Zip Code: 02141

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes
Priority Applicant Type: Economic Empowerment Priority
Economic Empowerment Applicant Certification Number: EE202234
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:
Department of Public Health RMD Registration Number:
Operational and Registration Status:
To your knowledge, is the existing RMD certificate of registration in good standing?:
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 46 Percentage Of Control: 46
Role: Owner / Partner Other Role: CEO

First Name: Jessica **Last Name:** Pelletier **Suffix:**
Gender: Female **User Defined Gender:**
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 16 **Percentage Of Control:** 16
Role: Owner / Partner **Other Role:** COO
First Name: Tony **Last Name:** Verzura **Suffix:**
Gender: Male **User Defined Gender:**
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 16 **Percentage Of Control:**
16
Role: Owner / Partner **Other Role:** Director of Business
Development
First Name: Michael **Last Name:** Latulippe **Suffix:**
Gender: Male **User Defined Gender:**
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French), Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 11 **Percentage Of Control:**
11
Role: Owner / Partner **Other Role:** Executive Director
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:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: 5.5 **Percentage Of Control:**
5.5
Role: Executive / Officer **Other Role:** Chief Financial Officer
First Name: Isiah **Last Name:** Benjamin **Suffix:**
Gender: Male **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:

Person with Direct or Indirect Authority 6

Percentage Of Ownership: 5.5 **Percentage Of Control:**
5.5
Role: Executive / Officer **Other Role:** Chief Marketing Officer

First Name: Tatiyana Last Name: Benjamin 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 WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100 Percentage of Ownership: 100
Entity Legal Name: Advesa MA, Inc. Entity DBA: DBA
City:
Entity Description: Applicant company owned and operated by Economic Empowerment Priority Applicants.
Foreign Subsidiary Narrative:
Entity Phone: 860-992-2374 Entity Email: jessica@gomjco.com Entity Website:
Entity Address 1: 690 Broadway Entity Address 2:
Entity City: Somerville Entity State: MA Entity Zip Code: 02144
Entity Mailing Address 1: 690 Broadway Entity Mailing Address 2:
Entity Mailing City: Somerville Entity Mailing State: MA Entity Mailing Zip Code:
02144
Relationship Description: Advesa MA, Inc. will have exclusive authority over the Marijuana Establishment. Authority and ownership is exercised through Advesa MA's shareholder agreement.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: Tony Owner Last Name: Verzura Owner Suffix:
Entity Legal Name: Blue River of Florida, LLC. Entity DBA:
Entity Description: Solventless technology company that works with strategic licensed operators to help them create our branded products.
Entity Phone: 800-454-5160 Entity Email: Entity Website: https://www.blueriverterps.com
support@blueriverterps.com
Entity Address 1: 17071 West Dixie Highway Entity Address 2:
Entity City: North Miami Beach Entity State: FL Entity Zip Code: 33160 Entity Country: USA
Entity Mailing Address 1: 17071 West Dixie Highway Entity Mailing Address 2:
Entity Mailing City: North Miami Beach Entity Mailing State: FL Entity Mailing Zip Code: 33160 Entity Mailing
Country: USA

Business Interest in Other State 2

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

Owner First Name: Tony	Owner Last Name: Verzura	Owner Suffix:
Entity Legal Name: Advesa Wellness, Inc.	Entity DBA:	
Entity Description: Cannabis product manufacturer License CDPH-10002139.		
Entity Phone: 888-479-3339	Entity Email: support@advesawellness.com	Entity Website: https://www.advesawellness.com
Entity Address 1: 1300 Clay St.	Entity Address 2:	
Entity City: Oakland	Entity State: CA	Entity Zip Code: 94612 Entity Country: USA
Entity Mailing Address 1: 1300 Clay St.	Entity Mailing Address 2:	
Entity Mailing City: Oakland	Entity Mailing State: CA	Entity Mailing Zip Code: 94612 Entity Mailing Country: USA

Business Interest in Other State 3

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

Owner First Name: Tony	Owner Last Name: Verzura	Owner Suffix:
Entity Legal Name: RiverRock, LLC.	Entity DBA:	
Entity Description: Vertically integrated medical and adult use license holder in the state of Colorado.		
Entity Phone: 303-474-4136	Entity Email: info@riverrockcolorado.com	Entity Website: https://www.riverrockcolorado.com
Entity Address 1: 4935 York St.	Entity Address 2:	
Entity City: Denver	Entity State: CO	Entity Zip Code: 80216 Entity Country: USA
Entity Mailing Address 1: 4935 York St.	Entity Mailing Address 2:	
Entity Mailing City: Denver	Entity Mailing State: CO	Entity Mailing Zip Code: 80216 Entity Mailing Country: USA

Business Interest in Other State 4

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

Owner First Name: Tony	Owner Last Name: Verzura	Owner Suffix:
Entity Legal Name: NXTLVL, Inc.	Entity DBA:	
Entity Description: Marijuana delivery license		
Entity Phone: 510-712-1136	Entity Email: support@nxtlvl.delivery.com	Entity Website: https://www.nxtlvl.delivery.com
Entity Address 1: 1300 Clay St.	Entity Address 2:	
Entity City: Oakland	Entity State: CA	Entity Zip Code: 94612 Entity Country: USA
Entity Mailing Address 1: 1300 Clay St.	Entity Mailing Address 2:	
Entity Mailing City: Oakland	Entity Mailing State: CA	Entity Mailing Zip Code: 94612 Entity Mailing Country: USA

Business Interest in Other State 5

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

Owner First Name: Tony	Owner Last Name: Verzura	Owner Suffix:
Entity Legal Name: Jingubang, Inc.	Entity DBA:	
Entity Description: Cannabis Transport License		
Entity Phone: 510-838-5775	Entity Email: support@jingubang.co	Entity Website: https://www.jingubang.co
Entity Address 1: 5733 SAN LEANDRO ST.	Entity Address 2: #P4	
Entity City: Oakland	Entity State: CA	Entity Zip Code: 94621 Entity Country: USA

Entity Mailing Address 1: 5733 SAN LEANDRO ST.		Entity Mailing Address 2: #P4	
Entity Mailing City: Oakland	Entity Mailing State: CA	Entity Mailing Zip Code: 94621	Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Jessica	Last Name: Pelletier	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

Individual 2

First Name: Tony	Last Name: Verzura	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

Individual 3

First Name: Michael	Last Name: Latulippe	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

Individual 4

First Name: Isiah	Last Name: Benjamin	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

Individual 5

First Name: Tatiyana	Last Name: Benjamin	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

Individual 6

First Name: Shanel	Last Name: Lindsay	Suffix:
Marijuana Establishment Name: Advesa MA, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Somerville	Marijuana Establishment State: MA	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 966 Cambridge St.	
Establishment Address 2:	
Establishment City: Cambridge	Establishment Zip Code: 02141
Approximate square footage of the establishment: 2629	How many abutters does this property have?: 99
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes	

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Zoning - Cambridge - Advesa.pdf	pdf	6050f91440676f35abee3724	03/16/2021

Certification of Host Community Agreement	Advesa MA, Inc. - Host Community Agreement Certification.pdf	pdf	606678758d8557457dbb62f0	04/01/2021
Community Outreach Meeting Documentation	Advesa Cambridge Community Outreach Attestation Form_FINAL.pdf	pdf	6066893a8bb25444af2fe3cf	04/01/2021

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Advesa Cambridge_Plan for Positive Impact.pdf	pdf	6050f931c997b43574a1d137	03/16/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role: Chief Executive Officer

First Name: Jessica Last Name: Pelletier Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role: Chief Financial Officer

First Name: Isiah Last Name: Benjamin Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role: Chief Marketing Officer

First Name: Tatiyana Last Name: Benjamin Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Owner / Partner Other Role: Chief Operations Officer

First Name: Tony Last Name: Verzura Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 5

Role: Owner / Partner Other Role: Director of Business Development

First Name: Michael Last Name: Latulippe Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 6

Role: Owner / Partner **Other Role:** Executive Director

First Name: Shanel **Last Name:** Lindsay **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:**

Entity Legal Name: Advesa MA, Inc. **Entity DBA:**

Entity Description: Applicant company owned and operated by Economic Empowerment Priority Applicants.

Phone: 860-992-2374 **Email:** jessica@gomjco.com

Primary Business Address 1: 690 Broadway **Primary Business Address 2:**

Primary Business City: Somerville **Primary Business State:** MA **Principal Business Zip Code:** 02144

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	B - SOS-Good-Standing_Advesa-MA.pdf	pdf	6051064d183b5235aa44f9d3	03/16/2021
Department of Revenue - Certificate of Good standing	C - DOR-Good-Standing_Advesa-Ma-Inc.pdf	pdf	6051064fb64912358e315b6b	03/16/2021
Articles of Organization	D - Articles_Advesa-MA-Inc.pdf	pdf	60510650d7adff35b5a51055	03/16/2021
Bylaws	E - Advesa_MA_Bylaws.pdf	pdf	6051065393441135c0c3490e	03/16/2021
Articles of Organization	F - Supplemental-Info_Advesa-MA-Inc.pdf	pdf	60510655b3603835a49f6125	03/16/2021
Secretary of Commonwealth - Certificate of Good Standing	Advesa MA - Good Standing - Department of Unemployment Assistance.pdf	pdf	606ca08e5997354560763865	04/06/2021

No documents uploaded

Massachusetts Business Identification Number: 001339796

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Advesa MA - Plan for Obtaining Liability Insurance.pdf	pdf	605106af01124c35d20a3bff	03/16/2021
Proposed Timeline	Proposed Timeline to Operation - Cambridge.pdf	pdf	6051190eefe1e0359b95d990	03/16/2021
Business Plan	Advesa MA Cambridge Business Plan.pdf	pdf	6053638289d65207913a9397	03/18/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan or Obtaining Marijuana or Marijuana Products (Cambridge) .pdf	pdf	6053755dd13a03079c5f687d	03/18/2021
Separating recreational from medical operations, if applicable	Separating Recreational from Medical Operations (Cambridge).pdf	pdf	60537607c94e7f0783731808	03/18/2021
Restricting Access to age 21 and older	Plan for Restricting Access to Age 21 and Older (Cambridge).pdf	pdf	605376eb021c1507b3980e6d	03/18/2021
Security plan	Security Plan (Cambridge).pdf	pdf	60537a4059735d07bd821849	03/18/2021
Prevention of diversion	Prevention of Diversion (Cambridge).pdf	pdf	60537b051c41b407a7672ab9	03/18/2021
Storage of marijuana	Storage of Marijuana (Cambridge).pdf	pdf	60537ce2c94e7f078373183a	03/18/2021
Transportation of marijuana	Transportation of Marijuana (Cambridge).pdf	pdf	60537dd27e61bd07773a9ef8	03/18/2021
Inventory procedures	Inventory Procedures (Cambridge).pdf	pdf	60537e9ed13a03079c5f68c8	03/18/2021
Quality control and testing	Quality Control and Testing (Cambridge).pdf	pdf	60537f1115bf0e07a4ba5705	03/18/2021
Dispensing procedures	Dispensing Procedures (Cambridge).pdf	pdf	60537fbc4c3a6c079db3d1c8	03/18/2021
Personnel policies including background checks	Personnel Policies Including Background Checks (Cambridge).pdf	pdf	605380d8a9f50407ba30b8cd	03/18/2021
Record Keeping procedures	Record Keeping Procedures (Cambridge).pdf	pdf	605381bc89d65207913a9494	03/18/2021
Maintaining of financial records	Plan for Maintaining Financial Records (Cambridge).pdf	pdf	60538251e5be0207aec720e2	03/18/2021
Diversity plan	Cambridge - Advesa MA - Diversity Plan.pdf	pdf	605382981c41b407a7672afb	03/18/2021
Qualifications and training	Qualifications and Training (Cambridge).pdf	pdf	60538327e5be0207aec720ec	03/18/2021
Energy Compliance Plan	Energy Compliance Plan (Cambridge).pdf	pdf	605383bbd13a03079c5f68f2	03/18/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would

be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.:

I Agree

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

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

ADVESA

Plan to Remain Compliant with Zoning in Cambridge

Advesa will remain compliant at all times with the local zoning requirements set forth in the Cambridge Zoning Ordinance, including the December 6, 2018 Ordinance No. 1404 Amending the Zoning Ordinances of the City of Cambridge to Amend Article 2.000, Section 4.35, Section 4.37, Section 4.40, Section 6.36.5, Section 6.36.7, and Section 11.800 Regarding Adult Use Marijuana Establishments.

Under the existing Cambridge Zoning Ordinance, Advesa's 966 Cambridge St. marijuana retail establishment will be located within BA ("Business A") zoning district, and within the Cannabis Establishments Selected Base Zoning Districts and Buffers. These districts allow zoning and permits for marijuana retail establishments to be operated after obtaining a special permit and a license from the License Commission. Advesa in Cambridge has already obtained our special permit to operate a Marijuana Retailer in Cambridge and has been approved by local authorities.

The proposed establishment complies with the adult use marijuana establishment-specific zoning requirements because:

- There are no K-12 Schools within 300 feet of the proposed establishment.
- There are no cannabis establishments within 1,800 feet of the proposed establishment.
- There are no playgrounds, athletic fields, or youth recreation facilities within 300 feet of the proposed establishment.
- Located in a permanent building.
- No packaging or re-packaging of cannabis products will occur on-site.
- Location and design of cannabis use will not detract from the sense of activity with opaque, unwelcoming façade at ground floor in retail areas.
- Loading, refuse and service areas are designed to be secure and shielded from abutting uses.
- Building and site are designed to be compatible with other buildings in the area and to mitigate any negative aesthetic impacts that might result from required security measures and restrictions on visibility into the building's interior.
- Advesa intends to install four short-term bicycle spaces (primarily for customer use) and two long-term bicycle spaces (for employee use). This proposal provides twice the number of spaces required by the Cambridge Zoning Ordinance.

- Any and all exterior alterations will be conducted in accordance with applicable zoning rules and regulations for cannabis retail stores. All door and window treatments that activate street frontage will promote transparency and visibility in the space and a lively neighborhood. We intend to work with Community Development Department staff to continue an ongoing review of any alterations being made to the building.
- We intend to hire a Community Engagement Director from the local neighborhood who will help us address any complaints from the community and give all abutters access to a specific number and email address to contact the director at any time. In addition to our required community outreach meetings, we intend to host quarterly community engagement meetings to hear concerns from neighboring residents and businesses for at least the first year of operations.
- Signage will incorporate no internal illumination, be subject to review as part of the special permit process, and conform to all requirements of 935 CMR 500 and G.L. c. 94C, § 34.



Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Certification

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

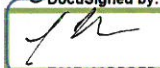
1. Name of applicant:

Advesa MA, Inc.

2. Name of applicant's authorized representative:

Jessica Pelletier

3. Signature of applicant's authorized representative:



E997123BDDFD46D...

4. Name of municipality:

City of Cambridge

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

Louis A. DePasquale



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



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

citymanager@cambridgema.gov

8. Host community agreement execution date:

March 23, 2021



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):

4/1/2021
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.



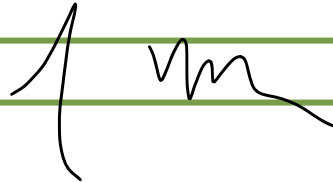
Name of applicant:

Advesa MA, Inc.

Name of applicant's authorized representative:

Jessica Pelletier

Signature of applicant's authorized representative:



ATTACHMENT A



COMMUNITY
NEWSPAPER
COMPANY

GateHouse Media New England

Community Newspaper Co. – Legal Advertising Proof

15 Pacella Park Drive, Randolph, MA 02368
1800-624-7355 phone | 781-961-3045 fax

Order Number: CN13947384

Salesperson: Deborah Dillon

Michael Latulippe
Andrew Verzura Advessa Wellness, Inc.
17071 West Dixie Highway
North Miami Beach, FL 33150

Title: Cambridge Chronicle
Start date: 3/18/2021
Insertions: 1
Price: \$256.57

Class: Legals
Stop date: 3/18/2021
#Lines: 87 ag

966 CAMBRIDGE STREET

LEGAL NOTICE

NOTICE OF COMMUNITY
OUTREACH MEETING
ADVESA MA, INC.

Notice is hereby given ADVESA MA, INC (“Advesa”) will hold a Virtual Community Outreach Meeting on Thursday, April 1, 2021 at 6:00pm to discuss the proposed siting of a licensed Marijuana Retail establishment at 966 Cambridge Street in Cambridge, Massachusetts 02141.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission’s Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

The Virtual Community Outreach Meeting via Zoom is available using the following link: <https://us02web.zoom.us/j/82607420326?pwd=K2RWY1BEdmw4UHZKOXRaRVJoLzNwUT09> or via telephone at (929) 205-6099 using Webinar ID: 826 0742 0326. The passcode to enter the meeting is 901529.

ATTACHMENT A

A copy of the meeting presentation will be made available at least 24 hours prior to the meeting at <https://www.advesacorp.com/cambridge/>.

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

Inquiries regarding ADA accessibility for the meeting may be submitted to support@blueriverterps.com.

AD#13947384

Cambridge Chronicle 3/18/21

ATTACHMENT B

NOTICE OF COMMUNITY OUTREACH MEETING ADVESA MA, INC.

Notice is hereby given ADVESA MA, INC ("Advesa") will hold a Virtual Community Outreach Meeting on **Thursday, April 1st, 2021** at 6:00pm to discuss the proposed siting of a licensed Marijuana Retail establishment at 966 Cambridge Street in Cambridge, Massachusetts 02141.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 *et seq.*

The Virtual Community Outreach Meeting via Zoom is available using the following link: <https://us02web.zoom.us/j/82607420326?pwd=K2RWY1BFdmw4UHZKOXRaRVJoLzNwUT09> or via telephone at (929) 205-6099 using Webinar ID: 826 0742 0326. The passcode to enter the meeting is 901529.

A copy of the meeting presentation will be made available at least 24 hours prior to the meeting at <https://www.advesacorp.com/cambridge/>.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing support@blueriverterps.com or asked during the meeting after the presentation. Inquiries regarding ADA accessibility for the meeting may be submitted to support@blueriverterps.com

2021 MAR 23 AM 11:33
OFFICE OF THE CITY CLERK
CAMBRIDGE, MASSACHUSETTS

ATTACHMENT C

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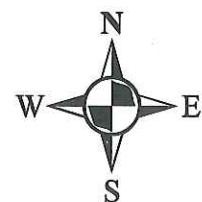
ATTACHMENT C

MAP TITLE



Cambridge, MA Assessing Department

Gayle Willett, Director



ATTACHMENT C

Estimated Delivery Date
Fri 12/11/2020
Certified Mail®
Tracking #: 70181130000096170132
Return Receipt
Tracking #: 9590 9402 5767 0003 5508 31
Total \$3.55 \$2.85 \$6.95

Grand Total: \$430.90
Debit Card Remitted
Card Name: VISA
Account #: XXXXXXXXXX7417
Approval #: 378
Transaction #: 025954
Receipt #: 025954
Debit Card Purchase: \$430.90
AID: A0000000980840
AL: US DEBIT
PIN: Verified

Due to limited transportation
availability as a result of
nationwide COVID-19 impacts
package delivery times may be
extended. Priority Mail Express®
service will not change.

In a hurry? Self-service kiosks offer
quick and easy check-out. Any Retail
Associate can show you how.

Text your tracking number to 28777 (2USPS)
to get the latest status. Standard Message
and Data rates may apply. You may also
visit www.usps.com USPS Tracking or call
1-800-950-1614

9590 9402 5767 0003 5511 97
s Mail® 1 \$6.95
Fri 12/11/2020
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Fri 12/11/2020
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Tracking #: 70181130000096173140
Return Receipt
Tracking #: 9590 9402 5767 0003 5511 73
ard Name: VISA
Card Remitted \$48.65
Transaction #: 379
Receipt #: 025955
Debit Card Purchase: \$48.65
AID: A0000000980840
AL: US DEBIT
PIN: Verified

Tracking #: 9590 9402 6072 0125 7004 48
Return Receipt
Tracking #: 70201810000172964482
Cambridge, MA 02141
Weight: 0 1b 0.50 oz
Estimated Delivery Date
Sat 03/27/2021
Certified Mail®
Tracking #: 70201810000172964963
Return Receipt
Tracking #: 9590 9402 6072 0125 7003 94
Total \$2.85 \$3.60 \$7.00

Grand Total: \$406.00
Debit Card Remitted
Card Name: VISA
Account #: XXXXXXXXXX7417
Approval #: 001346
Transaction #: 721
Receipt #: 018417
Debit Card Purchase: \$406.00
AID: A0000000980840
AL: US DEBIT
PIN: Verified

USPS is experiencing unprecedented volume
increases and limited employee
availability due to the impacts of
COVID-19. We appreciate your patience.

Text your tracki...

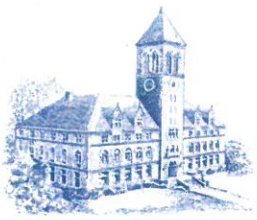
Due to limited transportation
availability as a result of
nationwide COVID-19 impacts
package delivery times may be
extended. Priority Mail Express®
service will not change.

in a hurry? Self-service kiosks offer
quick and easy check-out. Any Retail
Associate can show you how.

Tracking #: 9590 9402 6072 0125 6993 46
Total \$7.00
First-Class Mail® 1 \$0.55
West Newton, MA 02465
Weight: 0 1b 0.50 oz
Estimated Delivery Date
Sat 03/27/2021
Certified Mail®
Tracking #: 70181130000096159885
Return Receipt
Tracking #: 9590 9402 6072 0125 6993 39
Total \$2.85 \$3.60 \$7.00

Grand Total: \$273.00
Debit Card Remitted
Card Name: VISA
Account #: XXXXXXXXXX7417
Approval #: 000813
Transaction #: 884
Receipt #: 029537
Debit Card Purchase: \$273.00
AID: A0000000980840
AL: US DEBIT
PIN: Verified

USPS is experiencing unprecedented volume
increases and limited employee
availability due to the impacts of
COVID-19. We appreciate your patience.



City of Cambridge

Executive Department

LOUIS A. DePASQUALE
City Manager

LISA C. PETERSON
Deputy City Manager

February 2, 2021

Cannabis Control Commission
2 Washington Square,
Worcester, MA 01604 (617)
701-8400

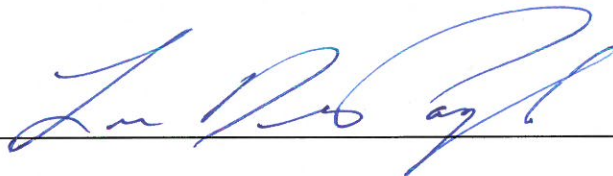
To whom this may concern,

The City of Cambridge has been informed that Advesa MA, Inc. will conduct a virtual Community Outreach Meeting on its intention to apply for a retail cannabis license. The meeting will be held virtually on an Online Zoom Meeting Link or other comparable online meeting platform, and the link will be provided in notification to abutters and publication in the newspaper. Advesa MA, Inc. intends to apply for a retail cannabis license, at 966 Cambridge Street, Cambridge, MA 02141 (the "Premises") pursuant to M.G.L. Ch. 94G and Chapter 55 of the Acts of 2017 and other applicable laws and regulations promulgated thereunder, including those promulgated thereunder by the Massachusetts Cannabis Control Commission.

This letter confirms that the contracting authority of the host community approves Advesa MA, Inc. to host a virtual community outreach meeting.

By:
Contracting Authority/ Authorized Representative of the City of Cambridge

Name: City Manager Louis A. DePasquale

X 

Date: 2/2/21

cc: Advesa MA, Inc.



Advesa MA, Inc.
Virtual Community Outreach Meeting
4/1/2021

Number of participants: 19

Length of meeting: 1 hour 20 minutes

Presentation link: <https://www.advesacorp.com/cambridge>

Advesa MA, Inc.

Plan for Positive Impact Executive Summary

Cambridge Marijuana Retailer

Advesa's principals' success and Advesa's certification by the Cannabis Control Commission (CCC) as an economic empowerment applicant are built upon Advesa's long history of empowering diverse individuals within the cannabis industry. In addition to the requirements on hiring for Economic Empowerment applicants mandated by the CCC, Advesa will contribute to diversity in both hiring and economic development in Cambridge by combining the lessons it has learned in Oakland with community engagement and understanding. Advesa's Plan for Positive Impact 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. Additionally, any actions taken, or programs instituted, by the Advesa MA, Inc. will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws. We also acknowledge that the progress or success of this plan must be documented upon renewal in order for us to obtain or maintain licensure.

Our Goals

Advesa will build upon the success of our equity program in California and have the goal to educate, incubate and assist at least one Social Equity Program Participant (SE) or Economic Empowerment Priority Applicant (EE). In addition to incubating at least one applicant, we will hold quarterly educational events, and make a regular monetary donation to an organization that helps individuals harmed by the war on drugs.

Goal 1: Provide Office Space and Assistance to one EE or SE applicant

The goal of the Advesa Incubation Program will be to provide free office space and assistance with creating a cannabis focused business either licensed or ancillary in a twelve-month time frame to one EE or SE applicant. Developing generational wealth for individuals and communities of disproportionate impact starts with the proper set and setting which we believe will be an office setting inside an operational Marijuana Retailer where the chosen applicant will be exposed to operational management of a marijuana business, as well as have a

location for which to develop their own business and pathway forward with confidence.

- I. If the applicant wishes to become a licensed Marijuana Establishment (ME), our goal here will be to have the EE/SE applicant set up in an office space where they can utilize our office resources to accomplish their goals during the twelve months they're incubated.
- II. If the applicant is an ancillary business, we will have the goal of them utilizing our resources and setting up their office inside our space so that they can accomplish their goals starting an ancillary business during the twelve-month time frame they're incubated.
- III. EE/SE Applicant will have to have been previously incarcerated for a marijuana related offense and/or from an area of disproportionate impact as determined by the Cannabis Control Commission.
- IV. Applicant will successfully develop their business model, incorporate, and begin implementation of their business by way of contracts before exiting the incubator within twelve months.
- V. Applicant will receive mentorship from a member of the Advesa Executive team every week to encourage their progress and ensure they're meeting their goals.
- VI. Applicant will receive financial support in developing their business including state filing requirements, banking, branding, marketing, b2b, and b2c front facing support if requested.

- **Outreach for Incubator Participants** - Advesa intends to work with individuals that qualify under the CCC's Social Equity Program or are EE Priority Applicants. We intend to host an online outreach event for participants joining the Incubator Program 45 days after we have received our commence operations notice from the Commission. Once the event is held, we will make our choice on which applicant we intend to incubate within 10 business days. Advesa will not take ownership in any applicants we incubate.
- **Quarterly Progress Reports** - For the purpose of reporting to the CCC and also internal progress we will create quarterly progress reports on the applicants venture and what is still needed to comply with the twelve-month time frame goal of the incubation program. These reports will be prepared by Advesa's Executive Director Shanel Lindsay.

Goal 2: Host Quarterly Educational Online Events on Cannabis for SE, EE, and qualifying individuals with a conviction from a marijuana related crime.

We believe that it is a spark of inspiration that leads to some of the greatest innovations and generational wealth created in our history. Advesa's Quarterly educational events are meant to be that spark that helps EE/SE applicants and individuals from areas of disproportionate impact connect with the ideas and resources necessary to thrive. The goal of our four annual educational events will be focused on **how to create a successful cannabis product, niche marketing, how royalties and wholesale contracts work with MEs, and how to successfully create a licensed cannabis business.** These online events will only be available to qualifying individuals and will be directed towards areas of disproportionate impact as determined by the Cannabis Control Commission. It is often events where people connect and learn about others journey to become successful entrepreneurs and bring generational wealth back to their home communities.

- **Quarterly Event Goals** - Each of the four topics will be separated into an event and we have a goal of at least 30 participants per event from areas of disproportionate impact and/or previous marijuana convictions as well as EE/SE applicants. We will also follow up with these individuals and ensure they apply to participate in our incubation program. Events will link all attendees with information and resources to learn more about the discussion topic as well as connect with the highlighted speaker.
- **Launching the Event Series** - Advesa will begin hosting these quarterly educational events 90 days following the receipt of commence operations from the CCC.

Our Measurements

Advesa plans to take great care to account and measure the success of their plan of positive impact with metrics and through the development of an equity committee that will meet regularly to discuss incoming metrics and improvements that may be needed to ensure all goals are reached on schedule.

Measurements for Goal One

1. Hosting online incubation event 45 days from commence operations.

2. Online incubation event has a goal of at least 30 qualifying attendees.
3. 100% of the online incubation event attendees were EE/SE applicants and/or from areas of disproportionate impact as determined by the Cannabis Control Commission or previously incarcerated for a marijuana related offense.
4. The event will be shared online through our corporate eventbrite account, Facebook, and Instagram as well as through avenues in disproportionately impacted communities as determined by the Commission selected by Advesa's Executive Director Shanel Lindsay.
5. We will select an applicant for incubation 10 days following the event being held.
6. Selected applicant is either EE/SE applicant and/or from a community of disproportionate impact as determined by the Commission or was previously incarcerated for a marijuana related crime.
7. Office space with the establishment selected and recorded within the 10 day time frame following the event.
8. Applicant determining what business they want to start and whether it will be ancillary or an ME. (30 Days)
9. Applicant filing State and Federal paperwork to start a business. (90 Days)
10. Applicant launching business Website (120 Days)
11. Applicant finding a suitable business location (180 Days)
12. Applicant starting local licensing process if applicable (210 Days)
13. Applicant seeking out companies to manufacture or carry ancillary products if applicable (210 Days)
14. Applicant starting state licensing process if applicable (300 Days)
15. Applicant submitting for state licensing if applicable (330 Days)

16. Applicant signing contract with ME to begin carrying ancillary products if applicable (330 Days)
17. Applicant received weekly mentorship from a member of the Advesa Executive team.
18. Applicant received financial support when necessary to help form their business.
19. Applicant successfully launched their business idea with Advesa's help.

Measurements for Goal Two

1. Quarterly event series shall have its first event 90 days from our commence operations authorized by the CCC.
2. Quarterly events shall seek to have a minimum of 30 participants per event.
3. 100% of Quarterly event participants will be EE/SE applicants and/or from areas of disproportionate impact as determined by the Cannabis Control Commission or previously incarcerated for a marijuana related offense.
4. Every month, quarterly events will be advertised across Advesa's corporate pages and accounts as well as through avenues in disproportionately impacted communities as determined by the Commission selected by Advesa's Executive Director Shanel Lindsay.
5. Every month, quarterly events will be shared across our company's social media profiles and included in our newsletter.
6. Every month, an outreach coordinator will contact organizations and groups in areas of disproportionate impact about Advesa's quarterly events.
7. Quarterly events shall focus on the following four topics during a twelve-month period: How to create a successful cannabis product, Niche Marketing, How Royalties and Wholesale Contracts Work, and How to Create a Successful Cannabis Business.
8. Quarterly events will be hosted by principals of Advesa as well as having one special guest per event.

9. Quarterly events shall provide information and resources for attendees to take home with them.
10. Quarterly events shall provide attendees with the contact information of the highlighted speaker to follow up with.
11. Event Surveys will be conducted within 7 days following every event to ask for feedback on the event.
12. Event Attendees will also receive a follow up email 60 days after the event to ask whether our event helped them progress on their projects.

Our Metrics

Metrics for Accountability of Goal One

1. When was the incubation event held? (Goal of 45 Days from Commence Operations)
2. How many applicants applied? (Goal of 30 applicants)
3. How many applicants applied with previous drug convictions?
4. When did you select an applicant (Goal of 10 Days following incubation event date)
5. Was the applicant selected previously incarcerated for a marijuana related offense?
6. Was the applicant selected from a community of disproportionate impact as determined by the Cannabis Control Commission?
7. Was the applicant selected an EE applicant?
8. Was the applicant selected an SE applicant?
9. Where was the incubation event posted? (Goal of at least having it posted on all our corporate accounts as well as through avenues in disproportionately

impacted communities as determined by the Commission selected by Advesa's Executive Director Shanel Lindsay)

10. Was office space selected and accepted by applicant? (Goal of 10 Days following incubation event date)
11. Did the applicant choose what type of cannabis business they want to start? (Goal of 30 days from starting work in the office)
12. Did the applicant file State / Federal paperwork to start a business? (Goal of 90 days from starting work in the office)
13. Did the Applicant launch a business Website? (120 Days)
14. Did the Applicant find a suitable business location? (180 Days)
15. Did the Applicant start the local licensing process if applicable (210 Days)
16. Did the Applicant seek out companies to manufacture or carry ancillary products if applicable (210 Days)
17. Did the Applicant start the state licensing process if applicable (300 Days)
18. Did the Applicant submit for state licensing if applicable (330 Days)
19. Did the Applicant sign a contract with an ME to begin carrying ancillary products if applicable (330 Days)

Metrics for Accountability of Goal Two

1. Did Advesa begin its Quarterly online event series 90 days from the commence operations authorized by the CCC?
2. Did Advesa's Quarterly events have at least 30 participants per event?
3. What percent of the attendees of Advesa's Quarterly events were from areas of disproportionate impact as determined by the Cannabis Control Commission?

4. What percent of the attendees of Advesa's Quarterly events were previously incarcerated for marijuana related offenses?
5. What percent of the attendees at Advesa's Quarterly events qualified for the EE program?
6. What percent of the attendees at Advesa's Quarterly events qualified for the SE program?
7. Were Advesa's Quarterly events advertised across its corporate pages and accounts as well as through avenues in disproportionately impacted communities as determined by the Commission selected by Advesa's Executive Director Shanel Lindsay every month? What avenues in disproportionately impacted communities as determined by the Commission selected by Advesa's Executive Director Shanel Lindsay shared or advertised the event?
8. Were Advesa's Quarterly events advertised across its social media accounts and newsletter every month?
9. Did Advesa's outreach coordinator reach out to organizations and groups located in areas of disproportionate impact about Advesa's quarterly events and what groups and organizations were contacted? Did those groups or organizations share the event?
10. Did Advesa Quarterly events focus on the following four topics during the twelve month period: *How to create a successful cannabis product, Niche Marketing, How Royalties and Wholesale Contracts Work, and How to Create a Successful Cannabis Business*?
11. Were the Quarterly events hosted by the principals of Advesa and did they have at least one special guest per event?
12. Did attendees leave with helpful information and resources to help them start their cannabis business?
13. Did event attendees leave with the contact information to follow up with the highlighted speaker?

14. Were event surveys conducted within 7 days following every event to ask for feedback on the event. What did they say?
15. Did Event Attendees receive a follow up email 60 days after the event to ask whether our event helped them progress on their projects. What did they say?



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

William Francis Galvin
Secretary of the
Commonwealth

Date: November 24, 2020

To Whom It May Concern :

I hereby certify that according to the records of this office,
ADVESA MA, INC.

is a domestic corporation organized on **August 03, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 20110973380

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

Processed by: smc



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

mass.gov/dor

Letter ID: L1270958400
Notice Date: December 3, 2020
Case ID: 0-000-908-734



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



JESSICA PELLETIER
ADVESA MA, INC.
690 BROADWAY
SOMERVILLE MA 02144-2220

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001339796

ARTICLE I

The exact name of the corporation is:

ADVESA MA, INC.

ARTICLE II

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

ARTICLE III

State the total number of shares and par value, if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CWP	\$0.00100	100,000	\$100.00	100,000

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

ARTICLE IV

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

ARTICLE V

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

ARTICLE VI

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

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

ARTICLE VII

The effective date of organization and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a *later* effective date is desired, specify such date, which may not be later than the *90th day* after the articles are received for filing.

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: UNITED STATES CORPORATION AGENTS, INC.
No. and Street: 101 BILLERICA AVE., BLDG. 5, SUITE 204
City or Town: NORTH BILLERICA State: MA Zip: 01862 Country: USA

c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	TONY MICHAEL VERZURA	745 ATLANTIC AVE. BOSTON, MA 02111 USA
TREASURER	MICHAEL JAMES LATULIPPE	745 ATLANTIC AVE. BOSTON, MA 02111 USA
SECRETARY	MICHAEL JAMES LATULIPPE	745 ATLANTIC AVE. BOSTON, MA 02111 USA
DIRECTOR	TONY MICHAEL VERZURA	745 ATLANTIC AVE. BOSTON, MA 02111 USA
DIRECTOR	MICHAEL JAMES LATULIPPE	745 ATLANTIC AVE. BOSTON, MA 02111 USA

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

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

INNOVATIVE TECH. SOLUTIONS FOR LIFE SCIENCE COMPAN

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

No. and Street: 745 ATLANTIC AVE.
City or Town: BOSTON State: MA Zip: 02111 Country: USA

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

No. and Street: 745 ATLANTIC AVE.
City or Town: BOSTON State: MA Zip: 02111 Country: USA
which is
☒ its principal office ☐ an office of its transfer agent
☐ an office of its secretary/assistant secretary ☐ its registered office

Signed this 3 Day of August, 2018 at 8:17:14 AM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

LEGALZOOM.COM, INC., A CALIFORNIA CORPORATION, CHEYENNE MOSELEY, ASSISTANT SECRETARY

THE COMMONWEALTH OF MASSACHUSETTS

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

August 03, 2018 08:16 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent "G" at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

***BYLAWS
OF
ADVESA MA INC.***

**ARTICLE 1
NAME, OFFICES AND PURPOSE**

Section 1.01. Name. The name of the corporation is Advessa MA, Inc. (the “Corporation”).

Section 1.02. Registered Office. The registered office of the Corporation shall be at 690 Broadway, City of Somerville, MA, Zip Code 02144. The Registered Agent in charge thereof is Jessica Verzura.

Section 1.03. Change of Registered Address. The Board of Directors of the Corporation (the “Board” or “Board of Directors”) may change the registered office from one location to another within the Commonwealth of Massachusetts by a resolution of the Board, and such change of address shall not require an amendment of these bylaws (the “Bylaws”).

Section 1.04. Principal Executive or Business Offices. The Board will fix the location of the principal executive office of the Corporation at any place within or outside the Commonwealth of Massachusetts. If the principal executive office is located outside Massachusetts and the Corporation has one or more business offices in Massachusetts, the Board will fix and designate a principal business office in Massachusetts.

Section 1.05. Other Offices. The Corporation may also have offices at such other places, within or without the Commonwealth of Massachusetts, where it is qualified to do business, as its business may require and as the Board may, from time to time, designate.

Section 1.06. Objective and Purpose. The primary objective and purpose of the Corporation shall be to engage in any lawful act or activity for which corporations may be organized under the laws of Massachusetts.

**ARTICLE II
SHAREHOLDERS**

Section 2.01. Place and Conduct of Meetings. Meetings of shareholders will be held at any place within or outside the Commonwealth of Massachusetts designated by the Board. In the absence of a designation by the Board, shareholders’ meetings will be held at the Corporation’s principal executive office. If authorized by the Board (in its sole discretion) and any guidelines and procedures adopted by the Board, shareholders not physically present in person or by proxy at a meeting of shareholders may, by electronic transmission by and to the Corporation or by electronic video screen communication, participate in a meeting of shareholders, be deemed present in person or by proxy, and vote, whether the meeting is to be held at a designated place or in whole or in

part by means of electronic transmission by and to the Corporation or by electronic video screen communication. A meeting of shareholders may be conducted, in whole or in part, by electronic transmission by and to the Corporation or by electronic video screen communication if:

(a) The Corporation implements reasonable measures to provide shareholders (in person or by proxy) a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting concurrently with those proceedings; and

(b) The Corporation maintains a record of the vote or action and any shareholder votes or other shareholder action is taken at the meeting by means of electronic transmission to the Corporation or electronic video screen communication.

Any request by the Corporation to a shareholder for consent to conduct a meeting of shareholders by electronic transmission must include a notice that absent consent of the shareholder, the meeting will be held at a physical location.

Section 2.02 Annual Meeting. An annual meeting shall be held once each calendar year for the purpose of electing directors and for the transaction of such other business as may properly come before the meeting. The annual meeting shall be held at the time and place designated by the Board of Directors from time to time.

Section 2.03 Special Meetings. A special meeting of the shareholders may be called at any time by the Board, by the chair of the Board (if any), by the president, or by shareholders entitled to cast not less than ten percent (10%) of the Corporation's voting power. If a special meeting is called by anyone other than the Board, the person or persons calling the meeting will make a request in writing, delivered personally or sent by registered mail, or by electronic transmission to the Corporation, to the chair of the Board (if any), president, any vice president, or secretary, by any person entitled to call a special meeting of shareholders (other than the Board), specifying the time and date of the meeting (which is not less than thirty (30) nor more than sixty (60) days after receipt of the request) and the general nature of the business proposed to be transacted. Within twenty (20) days after receipt, the officer receiving the request will cause notice to be given to the shareholders entitled to vote, in accordance with Sections 2.04, stating that a meeting will be held at the time requested by the person(s) calling the meeting, and stating the general nature of the business proposed to be transacted. If notice is not given within twenty (20) days after receipt of the request, the person or persons requesting the meeting may give the notice. Nothing in this paragraph will be construed as limiting, fixing, or affecting the time when a meeting of shareholders called by action of the Board may be held.

Section 2.04. Notice. Written notice of all shareholder meetings, whether regular or special meetings, shall be provided under this section or as otherwise required by law. The Notice shall state the place, date, and hour of meeting, and if for a special meeting, the purpose of the meeting. Such notice shall be mailed to all shareholders of record at the address shown on the corporate books, at least 10 days prior to the meeting. Such notice shall be deemed effective when deposited in ordinary U.S. mail, properly addressed, with postage prepaid.

Section 2.05. Quorum. A majority of the outstanding voting shares, whether represented in person or by proxy, shall constitute a quorum at a shareholders meeting. In the absence of a quorum, a majority of the represented shares may adjourn the meeting to another time without further notice. If a quorum is represented at an adjourned meeting, any business may be transacted that might have been transacted at the meeting as originally scheduled. The shareholders present at a meeting represented by a quorum may continue to transact business until adjournment, even if the withdrawal of some shareholders results in representation of less than a quorum.

Section 2.06. Adjourned Meeting; Notice.

(a) Any shareholders' meeting, annual or special, whether or not a quorum is present, may be adjourned from time to time by the vote of the majority of the shares represented at that meeting, either in person or by proxy, but in the absence of a quorum, no other business may be transacted at that meeting, except as provided in Section 5 Quorum.

(b) When any meeting of shareholders, either annual or special, is adjourned to another time or place, notice of the adjourned meeting need not be given if the time and place (or the means of electronic transmission by and to the Corporation or electronic video screen communication, if any, by which shareholders may participate) are announced at the meeting at which the adjournment is taken, unless a new record date for the adjourned meeting is fixed, or unless the adjournment is for more than forty-five (45) days after the date set for the original meeting, in which case the Board of Directors will set a new record date. Notice of any such adjourned meeting, if required, will be given to each shareholder of record entitled to vote at the adjourned meeting, in accordance with Sections 3 Notice and 4 Place of Meeting. At any adjourned meeting, the Corporation may transact any business that might have been transacted at the original meeting.

Section 2.07. Voting.

(a) The shareholders entitled to vote at any meeting of shareholders will be determined in accordance with Section 2.09, in the name of a corporation, or in joint ownership. The shareholders' vote may be by voice vote or by ballot, provided, however, that any election for directors must be by ballot if demanded by any shareholder before the voting has begun. On any matter other than the election of directors, any shareholder may vote part of the shares the shareholder is to vote in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal, but, if the shareholder fails to specify the number of shares that the shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares that the shareholder is entitled to vote. If a quorum is present (or if a quorum has been present earlier at the meeting but some shareholders have withdrawn), the affirmative vote of a majority of the shares represented and voting, provided such shares voting affirmatively also comprise a majority of the number of shares required for a quorum, will constitute an act of the shareholders unless the vote of a greater number or a vote by classes is required by law or by the Articles.

(b) At a shareholders' meeting at which directors are to be elected, no shareholder will be entitled to cumulate votes (i.e., cast for any candidate a number of votes greater than the number of votes which that shareholder normally would be entitled to cast), unless the candidates' names have been placed in nomination before commencement of the voting and a shareholder has given notice at

the meeting, before the voting has begun, of the shareholder's intention to cumulate votes. If any shareholder has given such a notice, then all shareholders entitled to vote may cumulate their votes for candidates in nomination. Thus each such shareholder may give one candidate a number of votes equal to the number of directors to be elected multiplied by the number of votes to which that shareholder's shares are normally entitled, or may distribute the shareholder's votes on the same principle among any or all of the candidates. The candidates receiving the highest number of votes, up to the number of positions to be filled, will be elected.

Section 2.08. Record Date for Shareholder Notice of Meeting, Voting, and Giving Consent.

(a) For purposes of determining the shareholders entitled to receive notice of and vote at a shareholders' meeting or give written consent to corporate action without a meeting, the Board may fix in advance a record date that is not more than sixty (60) nor less than ten (10) days before the date of a shareholders' meeting, or not more than sixty (60) days before any other action.

(b) If no record date is fixed:

(i) The record date for determining shareholders entitled to receive notice of and vote at a shareholders' meeting will be the business day next preceding the day on which notice is given, or, if notice is waived as provided in Section 2.09, the business day next preceding the day on which the meeting is held.

(ii) The record date for determining shareholders entitled to give consent to corporate action in writing without a meeting, if no prior action has been taken by the Board, will be the day on which the first written consent is given.

(c) A determination of shareholders of record entitled to receive notice of and vote at a shareholders' meeting will apply to any adjournment of the meeting unless the Board fixes a new record date for the adjourned meeting. However, the Board will fix a new record date if the adjournment is to a date more than forty-five (45) days after the date set for the original meeting.

(d) Only shareholders of record on the Corporation's books at the close of business on the record date will be entitled to any of the notice and voting rights listed in subsection (a) of this section, notwithstanding any transfer of shares on the Corporation's books after the record date, except as otherwise required by law.

Section 2.09. Waiver of Notice or Consent by Absent Shareholders.

(a) The transactions of any meeting of shareholders, either annual or special, however called and noticed and wherever held, will be as valid as though they were had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if each person entitled to vote who was not present in person or by proxy, either before or after the meeting, signs a written waiver of notice or a consent to holding the meeting or an approval of the minutes of the meeting. The waiver of notice or consent need not specify either the business to be transacted or the purpose of any annual or special meeting of the shareholders, except that, if action is taken or proposed to be taken for approval of any of those matters such as (i) a transaction in which a

director has a financial interest; (ii) an amendment of the Articles; (iii) a reorganization; (iv) a voluntary dissolution; or (v) a distribution in dissolution that requires approval of the outstanding shares.

(b) The waiver of notice or consent is required to state the general nature of the action or proposed action. All waivers, consents, and approvals will be filed with the corporate records or made a part of the minutes of the meeting.

(c) A shareholder's attendance at a meeting also constitutes a waiver of notice of that meeting, unless the shareholder at the beginning of the meeting objects to the transaction of any business on the ground that the meeting was not lawfully called or convened. In addition, attendance at a meeting does not constitute a waiver of any right to object to consideration of matters required by law to be included in the notice of the meeting which were not so included, if that objection is expressly made at the meeting.

Section 2.10. Proxies. Every person entitled to vote for directors or on any other matter will have the right to do so either in person or by one or more agents authorized by a written proxy signed by the person and filed with the secretary of the Corporation. A proxy will be deemed signed if the shareholder's name is placed on the proxy (whether by manual signature, electronic signature, or otherwise) by the shareholder or the shareholder's attorney in fact. A validly executed proxy that does not state that it is irrevocable will continue in full force and effect unless (i) revoked by the person executing it, before the vote pursuant to that proxy, by a writing delivered to the Corporation stating that the proxy is revoked, or by attendance at the meeting and voting in person by the person executing the proxy or by a subsequent proxy executed by the same person and presented at the meeting; or (ii) written notice of the death or incapacity of the maker of that proxy is received by the Corporation before the vote pursuant to that proxy is counted; provided, however, that no proxy will be valid after the expiration of eleven (11) months from the date of the proxy, unless otherwise provided in the proxy.

Section 2.11. Informal Action. Any action required to be taken, or which may be taken, at a shareholders meeting, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, is signed by the shareholders who own all of the shares entitled to vote with respect to the subject matter of the vote.

ARTICLE III DIRECTORS

Section 3.01. Number of Directors. The number of directors shall be not fewer than three (3) nor more than seven (7). The exact number of directors shall be fixed within these specified limits by the Board or the shareholders in the manner provided in these Bylaws. Contemporaneous with the adoption of these Bylaws, be the following named persons shall be recognized as the initial Directors of the Corporation:

1. Jessica Pelletier
2. Tony Michael Verzura
3. Michael James Latulippe
4. Isiah Benjamin

5. Tatiyana Benjamin
6. Shanel Lindsay

Section 3.02. Powers. Subject to the provisions of the Massachusetts Business Corporation Act and any limitations in the Articles and these Bylaws relating to action required to be approved by the shareholders or by the outstanding shares, the business and affairs of the Corporation will be managed and all corporate powers will be exercised by or under the direction of the Board. Without prejudice to these general powers, and subject to the same limitations, the Board will have the power to:

(a) Select and remove all officers, agents, and employees of the Corporation; prescribe any powers and duties for them that are consistent with law, with the Articles, and with these Bylaws; fix their compensation; and require from them security for faithful service.

(b) Conduct, manage, and control the affairs and business of the Corporation; make rules and regulations not inconsistent with the Articles or law or these Bylaws; to make all lawful orders on behalf of the Corporation; and to prescribe in the manner of executing the same.

(c) Change the principal executive office or the principal business office in the Commonwealth of Massachusetts from one location to another; cause the Corporation to be qualified to do business in any other state, territory, dependency, or country and conduct business within or outside the Commonwealth of Massachusetts and designate any place within or outside the Commonwealth of Massachusetts for holding any shareholders' meeting or meetings, including annual meetings.

(d) Adopt, make, and use a corporate seal; prescribe the forms of certificates of stock; and alter the form of the seal and certificates.

(e) Authorize the issuance of shares of stock of the Corporation on any lawful terms, in consideration of money paid, labor done, services actually rendered, debts or securities canceled, or tangible or intangible property actually received.

(f) Borrow money and incur indebtedness on behalf of the Corporation, and cause to be executed and delivered for the Corporation's purposes, in the corporate name, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, and other evidences of debt and securities.

Section 3.03. Election and Term of Office. The directors shall be elected at the annual shareholders meeting. Each director shall serve a term of three (3) years, or until a successor has been elected and qualified.

Section 3.04. Quorum. A majority of directors shall constitute a quorum.

Section 3.05. Adverse Interest. In the determination of a quorum of the directors, or in voting, the disclosed adverse interest of a director shall not disqualify the director or invalidate his or her vote.

Section 3.06. Regular Meeting. An annual meeting shall be held, without notice, immediately following and at the same place as the annual meeting of the shareholders. The Board of Directors may provide, by resolution, for additional regular meetings without notice other than the notice provided by the resolution.

Section 3.07. Special Meeting. Special meetings may be requested by the President, Vice-President, Secretary, or any two directors by providing five days written notice by ordinary United States mail, effective when mailed. Minutes of the meeting shall be sent to the Board of Directors within two weeks after the meeting.

Section 3.08. Procedures. The vote of a majority of the directors present at a properly called meeting at which a quorum is present shall be the act of the Board of Directors, unless the vote of a greater number is required by law or by these bylaws for a particular resolution. A director of the corporation who is present at a meeting of the Board of Directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless their dissent shall be entered in the minutes of the meeting. The Board shall keep written minutes of its proceedings in its permanent records.

If authorized by the governing body, any requirement of a written ballot shall be satisfied by a ballot submitted by electronic transmission, provided that any such electronic transmission must either set forth or be submitted with information from which it can be determined that the electronic transmission was authorized by the member or proxy holder.

Section 3.09. Informal Action. Any action required to be taken at a meeting of directors, or any action which may be taken at a meeting of directors or of a committee of directors, may be taken without a meeting if a consent in writing setting forth the action so taken, is signed by all of the directors or all of the members of the committee of directors, as the case may be.

Section 3.10. Removal / Vacancies. A director shall be subject to removal, with or without cause, at a meeting of the shareholders called for that purpose. Any vacancy that occurs on the Board of Directors, whether by death, resignation, removal or any other cause, may be filled by the remaining directors. A director elected to fill a vacancy shall serve the remaining term of his or her predecessor, or until a successor has been elected and qualified.

Section 3.11. Resignation. Any director may resign effective upon giving written notice to the chairperson of the board, the president, the secretary or the Board of Directors of the corporation, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective.

Section 3.12. Compensation. Directors and members of committees of the Board may be compensated for their services, and will be reimbursed for expenses, as fixed or determined by resolution of the Board. This section will not be construed to preclude any director from serving the Corporation in any other capacity, as an officer, agent, employee, or otherwise, or from receiving compensation for those services.

ARTICLE IV COMMITTEES

Section 4.01. **Committees.** The Board may, by resolution adopted by a majority of the authorized number of directors, designate one or more committees, each consisting of two or more directors. The Board may designate one or more directors as alternate members of any committee, to replace any absent member at a committee meeting. The appointment of committee members or alternate members requires the vote of a majority of the authorized number of directors. A committee may be granted any or all of the powers and authority of the Board, to the extent provided in the resolution of the Board establishing the committee, except with respect to:

- (a) Approving any action for which the Massachusetts Business Corporation Act also requires the approval of the shareholders or of the outstanding shares;
- (b) Filling vacancies on the Board or any committee of the Board;
- (c) Fixing directors compensation for serving on the Board or a committee of the Board;
- (d) Adopting, amending, or repealing Bylaws;
- (e) Amending or repealing any resolution of the Board that by its express terms is not so amendable or repealable;
- (f) Making distributions to shareholders, except at a rate or in a periodic amount or within a price range determined by the Board; or
- (g) Appointing other committees of the Board or their members.

Section 4.02. Meetings; Action of Committees. Meetings and action of committees will be governed by, and held and taken in accordance with, Bylaw provisions applicable to meetings and actions of the Board, with such changes in the context of those Bylaws as are necessary to substitute the committee and its members for the Board and its members, except that (1) the time of regular meetings of committees may be determined either by resolution of the Board or by resolution of the committee; (2) special meetings of committees may also be called by resolution of the Board; and (3) notice of special meetings of committees will also be given to all alternative members who will have the right to attend all meetings of the committee. The Board may adopt rules for the governance of any committee not inconsistent with these Bylaws.

ARTICLE V OFFICERS

Section 5.01. Officers. The officers of the corporation shall be a Chief Executive Officer/President, Chief Operating Officer, Treasurer, and a Secretary. The Corporation may also have, at the discretion of the Board, one or more vice presidents, one or more assistant secretaries, one or more assistant treasurers, and such other officers as may be appointed in accordance with Section 5.02. Any number of offices may be held by the same person.

Chief Executive Officer. The Chief Executive Officer shall also be the President and shall preside at all meetings of the Board of Directors and its Executive Committee, if such a committee is created by the Board. The Chief Executive Officer is expected to report on board accomplishments, insofar as the goals of the company are concerned. The Chief Executive Officer is also expected to make reports on the job performance of the directors and managers that work under the board. The initial Chief Executive Officer shall be Jessica Pelletier.

Chief Operating Officer. The Chief Operating Officer is expected to manage the day to day operations of the Corporation and oversee and be responsible for all non-executive employees. The Chief Operating Officer shall report directly to the Chief Executive Officer. The initial Chief Operating Officer shall be Tony Michael Verzura.

Treasurer. The Treasurer has a watchdog role over all aspects of financial management, working closely with other members of the Management Committee to safeguard the organization's finances. The Treasurer shall report directly to the Chief Executive Officer. The initial Treasurer shall be Isiah Benjamin.

Secretary. The Secretary shall give notice of all meetings of the Board of Directors and Executive Committee, if any, shall keep an accurate list of the directors, and shall have the authority to certify any records, or copies of records, as the official records of the corporation. The Secretary shall maintain the minutes of the Board of Directors' meetings and all committee meetings. The Secretary shall report directly to the Chief Executive Officer. The initial Secretary shall be Michael James Latulippe.

Section 5.02. Appointment. The officers of the Corporation, except for subordinate officers appointed in accordance with Section 5.03, will be appointed by the Board, and will serve at the pleasure of the Board.

Section 5.03. Subordinate Officers. The Board may appoint, and may empower the Chief Executive Officer to appoint, other officers as required by the business of the Corporation, whose duties will be as provided in the Bylaws, or as determined from time to time by the Board or the Chief Executive Officer.

Section 5.04. Removal and Resignation.

(a) Any officer chosen by the Board may be removed at any time, with or without cause or notice, by the Board. Subordinate officers appointed by persons other than the Board under Section 2.03 may be removed at any time, with or without cause or notice, by the Board or by the officer by whom appointed. Officers may be employed for a specified term under a contract of employment if authorized by the Board; such officers may be removed from office at any time under this section, and will have no claim against the Corporation or individual officers or Board members because of the removal except any right to monetary compensation to which the officer may be entitled under the contract of employment.

(b) Any officer may resign at any time by giving written notice to the Corporation. Resignations will take effect on the date of receipt of the notice, unless a later time is specified in the notice. Unless otherwise specified in the notice, acceptance of the resignation is not necessary to make it effective. Any resignation is without prejudice to the rights, if any, of the Corporation to monetary damages under any contract of employment to which the officer is a party.

Section 5.05. Vacancies. A vacancy in any office resulting from an officer's death, resignation, removal, or disqualification, or from any other cause, will be filled in the manner prescribed in these Bylaws for regular election or appointment to that office.

ARTICLE VI CORPORATE SEAL, EXECUTION OF INSTRUMENTS

The corporation shall not have a corporate seal. All instruments that are executed on behalf of the corporation which are acknowledged and which affect an interest in real estate shall be executed by the Chief Executive Officer/President, Chief Operating Officer, Treasurer, and Secretary. All other instruments executed by the corporation, including a release of mortgage or lien, may be executed by the Chief Executive Officer/President or Chief Operating Officer. Notwithstanding the preceding provisions of this section, any written instrument may be executed by any officer(s) or agent(s) that are specifically designated by resolution of the Board of Directors.

ARTICLE VII AMENDMENT TO BYLAWS

The bylaws may be amended, altered, or repealed by the Board of Directors or the shareholders by unanimous vote at any regular or special meeting; provided however, that the shareholders may from time to time specify particular provisions of the bylaws which shall not be amended or repealed by the Board of Directors.

ARTICLE VIII STOCK CERTIFICATES

Section 8.04. Certificates for Shares. Every owner of shares in the Corporation will be entitled to have a certificate, in such form, not inconsistent with the Articles or any law, as will be prescribed by the Board, certifying the number of shares, and class or series, owned by such shareholder in the Corporation. Shareholders can request and obtain a statement of rights, restrictions, preferences and privileges regarding classified shares or a class of shares with two or more series, if any, from the Corporation's principal executive office. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. Every certificate for shares shall be signed by either the chair of the Board, the vice chair of the Board, the Chief Executive Officer/President, the Treasurer, or the Secretary. Any or all of the signatures on the certificate may be facsimile. If any officer, transfer agent, or registrar who has signed or whose facsimile signature has been placed on a certificate will have ceased to be that officer, transfer agent, or registrar before that certificate is issued, the certificate may be issued by the Corporation with the same effect as if that person were an officer, transfer agent, or registrar at the date of issue.

Section 8.05. Lost Certificates. Except as provided in this Section 8.05, no new certificates for shares will be issued to replace old certificates unless the old certificate is surrendered to the Corporation for cancellation at the same time. If share certificates or certificates for any other security have been lost, stolen, or destroyed, the Board may authorize the issuance of replacement certificates on terms and conditions as required by the Board, which may include a requirement that the owner give the Corporation a bond (or other adequate security) sufficient to indemnify the Corporation against any claim that may be made against it (including any expense or liability) on account of the alleged loss, theft, or destruction of the old certificate or the issuance of the replacement certificate.

ARTICLE IX CORPORATE RECORDS AND REPORTS

Section 9.01. Maintenance of Shareholder Record and Inspection by Shareholders. The Corporation will keep at its principal executive office or at the office of its transfer agent or registrar, as determined by resolution of the Board, a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder. A shareholder or shareholders holding at least five percent (5%) in the aggregate of the outstanding voting shares of the Corporation have the right to do either or both of the following:

- (a) Inspect and copy the record of shareholders names and addresses and shareholdings during usual business hours, on five (5) days prior written demand on the Corporation, or
- (b) Obtain from the Corporation's transfer agent, on written demand and tender of the transfer agent's usual charges for this service, a list of the names and addresses of shareholders who are entitled to vote for the election of directors, and their shareholdings, as of the most recent record date for which a list has been compiled or as of a specified date later than the date of demand. This list will be made available within five (5) days after (i) the date of demand or (ii) the specified later date as of which the list is to be compiled.

The record of shareholders will also be open to inspection on the written demand of any shareholder or holder of a voting trust certificate, at any time during usual business hours, for a purpose reasonably related to the holder's interests as a shareholder or holder of a voting trust certificate. Any inspection and copying under this section may be made in person or by an agent or attorney of the shareholder or holder of a voting trust certificate making the demand.

Section 9.02. Maintenance and Inspection of Bylaws. The Corporation will keep at its principal executive office, or if its principal executive office is not in the Commonwealth of Massachusetts, at its principal business office in Massachusetts, the original or a copy of the Bylaws as amended to date, which will be open to inspection by the shareholders at all reasonable times during office hours. If the principal executive office of the Corporation is outside the Commonwealth of Massachusetts and the Corporation has no principal business office in this state, the secretary will, on the written request of any shareholder, furnish to that shareholder a copy of the Bylaws as amended to date.

Section 9.03. Maintenance and Inspection of Minutes and Accounting Records. The minutes of proceedings of the shareholders, Board, and committees of the Board, and the accounting books and records, will be kept at the principal executive office of the Corporation, or at such other place or places as designated by the Board. The minutes and the accounting books and records will be kept either in written form or in a form capable of being converted into written form. The minutes and accounting books and records will be open to inspection on the written demand of any shareholder or holder of a voting trust certificate at any reasonable time during usual business hours, for a purpose reasonably related to the holder's interests as a shareholder or holder of a voting trust certificate. The inspection may be made in person or by an agent or attorney, and will include the right to copy and make extracts. These rights of inspection will extend to the records of each subsidiary of the Corporation.

Section 9.04. Inspection by Directors. Every director will have the absolute right at any reasonable time to inspect all books, records, and documents of every kind and the physical properties of the Corporation and each of its subsidiary corporations. This inspection by a director may be made in person or by an agent or attorney, and the right of inspection includes the right to copy and make extracts of documents.

Section 9.05. Annual Report.

(a) Inasmuch as, and for as long as, there are fewer than one hundred (100) shareholders, the requirement of an annual report to shareholders is expressly waived. However, nothing in this provision will be interpreted as prohibiting the Board from issuing annual or other periodic reports to the shareholders, as the Board considers appropriate.

(b) If at any time the number of shareholders will exceed one hundred (100), the first paragraph of Section 9.05 will be repealed, and the following provisions will be substituted:

The Board will cause an annual report to be sent to the shareholders not later than one hundred twenty (120) days after the close of the fiscal year adopted by the Corporation. This report will be sent at least fifteen (15) before the annual meeting of shareholders to be held during the next fiscal year and in the manner specified for giving notice to shareholders in Section 2.05 of these Bylaws. The annual report will contain a balance sheet as of the end of the fiscal year and an income statement and a statement of cash flows for the fiscal year that are (1) prepared in accordance with generally accepted accounting principles applied on a consistent basis and (2) accompanied by any report of independent accountants, or, if there is no such report, the certificate of an authorized officer of the Corporation that the statements were prepared from the Corporation's books and records without audit.

Section 9.06. Financial Statements.

(a) The Corporation will keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Corporation on file in the Corporation's principal executive office for twelve (12) months; these documents will be exhibited at all reasonable times, or copies provided, to any shareholder on demand. Quarterly income statements and balance sheets referred to in this section will be accompanied by the report, if any,

of independent accountants engaged by the Corporation or the certificate of an authorized corporate officer stating that the financial statements were prepared from the Corporation's books and records without audit.

(b) If no annual report for the last fiscal year has been sent to shareholders, on written request of any shareholder made more than one hundred twenty (120) days after the close of the fiscal year the Corporation will deliver or mail to the shareholder, within thirty (30) days after receipt of the request, a balance sheet as of the end of that fiscal year and an income statement and statement of cash flows for that fiscal year.

(c) A shareholder or shareholders holding five percent (5%) or more of the outstanding shares of any class of stock of the Corporation may request in writing an income statement for the most recent 3-month, 6-month, or 9-month period (ending more than thirty (30) days before the date of the request) of the current fiscal year, and a balance sheet of the Corporation as of the end of that period. If such documents are not already prepared, the chief financial officer will cause them to be prepared and will deliver the documents personally or mail them to the requesting shareholders within thirty (30) days after receipt of the request. A balance sheet, income statement, and statement of cash flows for the last fiscal year will also be included, unless the Corporation has sent the shareholders an annual report for the last fiscal year.

Section 9.07. Annual Statement of General Information.

(a) The Corporation shall file a statement with the Secretary of State on the prescribed form, setting forth the authorized number of directors; the names and complete business or residence addresses of all incumbent directors; the names and complete business or residence addresses of the chief executive officer, the secretary, and the chief financial officer; the street address of the Corporation's principal executive office or principal business office in this state; a statement of the general type of business constituting the principal business activity of the Corporation; and a designation of the agent of the Corporation for the purpose of service of process, all in compliance with the Massachusetts Business Corporation Act.

(b) Despite the provisions of paragraph (a) of this section, if there has been no change in the information in the Corporation's last statement on file with the Secretary of State's office, the Corporation may, in lieu of filing the statement described in paragraph (a) of this section, advise the Secretary of State, on the appropriate form, that no changes in the required information have occurred during the applicable period.

ARTICLE X INDEMNIFICATION

Section 10.01. Agents, Proceedings, and Expenses. For the purposes of this Article, "agent" means any person who is or was a director, officer, employee, or other agent of the Corporation, or who is or was serving at the request of the Corporation as a director, officer, employee, or agent of another foreign or domestic corporation, partnership, joint venture, trust, or other enterprise, or who was a director, officer, employee, or agent of a foreign or domestic corporation that was a

predecessor corporation of the Corporation or of another enterprise at the request of such predecessor corporation; “proceeding” means any threatened, pending, or completed action or proceeding, whether civil, criminal, administrative, or investigative; and “expenses” includes, without limitation, attorney fees and any expenses of establishing a right to indemnification under Section 10.04 or Section 10.05(d).

Section 10.02. Actions Other Than by the Corporation. The Corporation will have the power to indemnify any person who was or is a party, or is threatened to be made a party, to any proceeding (other than an action by or in the right of the Corporation to procure a judgment in its favor) by reason of the fact that such person is or was an agent of the Corporation, against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with such proceeding if that person acted in good faith and in a manner that the person reasonably believed to be in or not opposed to the best interests of the Corporation and, in the case of a criminal proceeding, had no reasonable cause to believe the conduct of that person was unlawful. The termination of any proceeding by judgment, order, settlement, or conviction, or upon a plea of nolo contendere or its equivalent, will not, of itself, create a presumption either that the person did not act in good faith and in a manner that the person reasonably believed to be in the best interests of the Corporation or that the person had reasonable cause to believe that the person’s conduct was not unlawful.

Section 10.03. Actions by or in the Right of the Corporation. The Corporation will have the power to indemnify any person who was or is a party, or is threatened to be made a party, to any threatened, pending, or completed action by or in the right of the Corporation to procure a judgment in its favor, by reason of the fact that such person is or was an agent of the Corporation, against expenses actually and reasonably incurred by such person in connection with the defense or settlement of that action, if such person acted in good faith, in a manner such person believed to be in or not opposed to the best interests of the Corporation and its shareholders. No indemnification will be made under this Section 10.03 for the following:

- (a) Any claim, issue, or matter on which such person has been adjudged to be liable to the Corporation in the performance of such person’s duty to the Corporation and its shareholders, unless and only to the extent that the court in which such proceeding is or was pending will determine on application that, in view of all the circumstances of the case, such person is fairly and reasonably entitled to indemnity for expenses, and then only to the extent that the court will determine;
- (b) Amounts paid in settling or otherwise disposing of a pending action without court approval; or
- (c) Expenses incurred in defending a pending action that is settled or otherwise disposed of without court approval.

Section 10.04. Successful Defense by Agent. To the extent that an agent of the Corporation has been successful on the merits in defense of any proceeding referred to in Section 10.02 or 10.03, or in defense of any claim, issue, or matter therein, the agent will be indemnified against expenses actually and reasonably incurred by the agent in connection therewith.

Section 10.05. Required Approval. Except as provided in Section 10.04, any indemnification under this section will be made by the Corporation only if authorized in the specific case, after a determination that indemnification of the agent is proper in the circumstances because the agent has met the applicable standard of conduct set forth in Section 10.02 or 10.03 by one of the following:

- (a) A majority vote of a quorum consisting of directors who are not parties to such proceeding;
- (b) Independent legal counsel in a written opinion if a quorum of directors who are not parties to such a proceeding is not available;
- (c) The affirmative vote of a majority of shares of the Corporation entitled to vote represented at a duly held meeting at which a quorum is present; or the written consent of holders of a majority of the outstanding shares entitled to vote (for purposes of this Section 10.05(c), the shares owned by the person to be indemnified will not be considered outstanding or entitled to vote thereon);
- (d) The court in which the proceeding is or was pending, on application made by the Corporation or the agent or the attorney or other person rendering services in connection with the defense, whether or not such application by the agent, attorney, or other person is opposed by the Corporation.

Section 10.06. Advance of Expenses. Expenses incurred in defending any proceeding may be advanced by the Corporation before the final disposition of such proceeding on receipt of an undertaking by or on behalf of the agent to repay such amounts if it will be determined ultimately that the agent is not entitled to be indemnified as authorized in this Article 10.

Section 10.07. Other Contractual Rights. The indemnification provided by this Article 10 will not be deemed exclusive of any other rights to which those seeking indemnification may be entitled under, e.g., any bylaw, agreement, or vote of shareholders or disinterested directors, both regarding action in an official capacity and regarding action in another capacity while holding such office, to the extent that such additional rights to indemnification are authorized in the Articles of the Corporation. Nothing in this section will affect any right to indemnification to which persons other than such directors and officers may be entitled by contract or otherwise.

Section 10.08. Limitations. No indemnification or advance will be made under this Article 6, except as provided in Section 10.04 or Section 10.05(d), in any circumstance if it appears:

- (a) That it would be inconsistent with a provision of the Articles or Bylaws, a resolution of the shareholders, or an agreement which prohibits or otherwise limits indemnification; or
- (b) That it would be inconsistent with any condition expressly imposed by a court in approving settlement.

Section 10.09. Insurance. The Corporation may purchase and maintain insurance on behalf of any agent of the Corporation insuring against any liability asserted against or incurred by the agent

in that capacity or arising out of the agent's status as such, whether or not the Corporation would have the power to indemnify the agent against that liability under the provisions of this Article 10.

Section 10.10. Fiduciaries of Corporate Employee Benefit Plan. This Article 10 does not apply to any proceeding against any trustee, investment manager, or other fiduciary of an employee benefit plan in that person's capacity as such, even though that person may also be an agent of the Corporation. The Corporation will have the power to indemnify, and to purchase and maintain insurance on behalf of any such trustee, investment manager, or other fiduciary of any benefit plan for any or all of the directors, officers, and employees of the Corporation or any of its subsidiary or affiliated corporations.

Section 10.11. Effect of Amendment. Any amendment, repeal, or modification of this Article 10 will not adversely affect an agent's right or protection existing at the time of such amendment, repeal, or modification.

Section 10.12. Survival of Rights. The rights provided by this Article 10 will continue for a person who has ceased to be an agent and will inure to the benefit of the heirs, executors, and administrators of such person.

Section 10.13. Settlement of Claims. The Corporation will not be liable to indemnify any agent under this Article 10 or (a) any amounts paid in settlement of any action or claim effected without the Corporation's written consent, which consent will not be unreasonably withheld, or (b) any judicial award, if the Corporation was not given a reasonable and timely opportunity to participate, at its expense, in the defense of such action.

Section 10.14. Subrogation. In the event of payment under this Article 10, the Corporation will be subrogated, to the extent of such payment, to all of the rights of recovery of the agent, who will execute all papers required and will do everything that may be necessary to secure such rights, including the execution of such documents as may be necessary to enable the Corporation effectively to bring suit to enforce such rights.

Section 10.15. No Duplication of Payments. The Corporation will not be liable under this Article 10 to make any payment in connection with any claim made against the agent to the extent the agent has otherwise actually received payment, whether under a policy of insurance, an agreement, or a vote, or through other means, of the amounts otherwise indemnifiable under this Article.

ARTICLE XI DISSOLUTION


The corporation may be dissolved only with authorization of its Board of Directors given at a special meeting called for that purpose, and with the subsequent approval by a unanimous vote of the members.

Certification


Hereby certifies that the foregoing is a true and correct copy of the bylaws of the above-named corporation, duly adopted by the initial Board of Directors on December 29th, 2020.

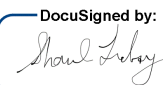
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Jessica Pelletier

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Tony Michael Verzura

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Michael James Latulippe

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Isiah Benjamin

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Tatiyana Benjamin

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Shanel Lindsay



The Commonwealth of Massachusetts
William Francis Galvin

No Fee

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

Statement of Change of Supplemental Information

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

1. Exact name of the corporation: ADVESA MA, INC.

2. Current registered office address:

Name: UNITED STATES CORPORATION AGENTS, INC.

No. and Street: 101 BILLERICA AVE., BLDG. 5, SUITE 204

City or Town: NORTH BILLERICA State: MA Zip: 01862 Country: USA

3. The following supplemental information has changed:

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	JESSICA PELLETIER	663A E 5TH ST BOSTON, MA 02127 USA
TREASURER	ISIAH BENJAMIN	17 SUDBURY ST. BROCKTON, MA 02301 USA
SECRETARY	MICHAEL JAMES LATULIPPE	190 BRIDGE ST. #2314 SALEM, MA 01970 USA
CEO	JESSICA PELLETIER	663A E 5TH ST BOSTON, MA 02127 USA
CFO	ISIAH BENJAMIN	17 SUDBURY ST. BROCKTON, MA 02301 USA
VICE PRESIDENT	TATIYANA BENJAMIN	17 SUDBURY ST. BROCKTON, MA 02301 USA
COO	TONY MICHAEL VERZURA	663A E 5TH ST BOSTON, MA 02127 USA
DIRECTOR OF BUSINESS DEVELOPMENT	MICHAEL JAMES LATULIPPE	190 BRIDGE ST. #2314 SALEM, MA 01970 USA
DIRECTOR	ISIAH BENJAMIN	17 SUDBURY ST. BROCKTON, MA 02301 USA
DIRECTOR	SHANEL LINDSAY	265 FRANKLIN ST. SUITE 1702 BOSTON, MA 02110 USA
DIRECTOR	JESSICA PELLETIER	663A E 5TH ST BOSTON, MA 02127 USA
DIRECTOR	TONY MICHAEL VERZURA	663A E 5TH ST BOSTON, MA 02127 USA
DIRECTOR	MICHAEL JAMES LATULIPPE	190 BRIDGE ST. #2314 SALEM, MA 01970 USA
DIRECTOR	TATIYANA BENJAMIN	17 SUDBURY ST. BROCKTON, MA 02301 USA

Fiscal year end:
December

 Type of business in which the corporation intends to engage:

INNOVATIVE TECH. SOLUTIONS FOR LIFE SCIENCE COMPAN

X Principal office address:

No. and Street: 745 ATLANTIC AVE.
8TH FLOOR

City or Town: BOSTON State: MA Zip: 02111 Country: USA

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

No. and Street: 745 ATLANTIC AVE.
8TH FLOOR

City or Town: BOSTON State: MA Zip: 02111 Country: USA

which is

X its principal office

 an office of its transfer agent

 an office of its secretary/assistant secretary

 its registered office

Signed by MICHAEL JAMES LATULIPPE, its OTHER OFFICER
on this 7 Day of October, 2019

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 07, 2019 10:01 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



323552495

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Advesa MA, Inc.
690 BROADWAY
SOMERVILLE, MA 02144-2220

EAN: 22188047
February 25, 2021

Certificate Id:45810

The Department of Unemployment Assistance certifies that as of 2/25/2021 ,Advesa MA, Inc. is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance

Plan to Obtain and Maintain Liability Insurance

Advesa will carry insurance as required by Massachusetts statute and regulations.

Advesa does not produce its own products, but rather acquires them from other cultivators/manufacturers. Any product, whether or not a cannabis product, that passes through an Advesa corporate entity or real estate controlled by such will require that the selling entity, i.e., supplier, carry sufficient product liability insurance and fully indemnify and defend Advesa should any such product cause damage to a consumer or property.

Additionally, products must strictly adhere to the more stringent of Advesa's or Massachusetts law's testing, track and trace, and quality specifications. Any product or brand that does not adhere to insurance requirements or the stringent specifications will not be allowed within Advesa's retail establishment.

Upon receipt of licenses in Massachusetts, Advesa will procure the required insurance or post the necessary security at opening and until such insurance is procured. Advesa also intends to carry the standard general liability, property, and umbrella insurance consistent with a consumer retail establishment of this type, plus any additional property or general liability endorsements required.

a. General. The policy will include general liability and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually. The deductible for each policy will be no higher than \$5,000 per occurrence as per *935 CMR 500.101(1)*; *935 CMR 500.105(10)*.

b. Workers' Compensation and Employers' Liability. The statutory limits of workers' compensation and employers' liability insurance in amounts adequate to satisfy the umbrella underlying requirements.

c. Excess/Umbrella Liability. Umbrella liability coverage in an amount not less than \$10,000,000 per occurrence. Umbrella liability coverage is to be in excess of the general liability and employers' liability requirements outlined above and such requirement shall be subject to reasonable modification based on market changes and insurance coverage standards generally applicable to commercial real estate

similar in type, use and location as the Premises. Such insurance shall name the City as an additional named insured.

ADVESA

CAMBRIDGE BUSINESS PLAN

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1. EXECUTIVE SUMMARY

1.1 WHO WE ARE

Advesa is a consortium of skilled professionals that are committed to fostering the growth of a robust, inclusive cannabis industry in Massachusetts. Our team was certified by the Cannabis Control Commission in 2018 as having demonstrated experience in or business practices that promote economic empowerment in communities disproportionately impacted by high rates of arrest and incarceration for offenses under chapter 94C of the General Laws. Several members of our team were actually involved in the development of the very language in both statute and regulation that helped create the state's social equity program and economic empowerment program. Our mission is driven by our priority economic empowerment status and going above and beyond what the state requires of those certified to ensure our company embodies the spirit behind the law and truly empowers those harmed most by cannabis prohibition.

Our company goals are driven by our priority economic empowerment status and going above and beyond what the state requires of those certified to ensure our company embodies the spirit behind the law and truly empowers those harmed most by cannabis prohibition. In Cambridge, we hope to open a retail dispensary facility for adult-use but our long-term plan is to manufacture and transport the highest quality cannabis offered in Massachusetts while simultaneously empowering individuals and communities disproportionately impacted by enforcement of cannabis laws.

1.2 MISSION

Empower communities disproportionately impacted by the war on drugs through education, rehabilitation, employment, and incubation of equity businesses.

1.3 VISION

Our vision is to provide state of the art dispensary and manufacturing facilities that integrate technology, policymakers, and academic communities by providing local education and economic empowerment opportunities.

1.4 ADVESA'S HISTORY

ADVESA CORPORATION was established in 2016 by cannabis inventor Tony Verzura and co-founded by Jessica Pelletier to be a flag ship project for manufacturing trademark branded products and provide private label processing services for companies throughout the California industry. Our founders, Tony Verzura and Jessica Pelletier maintain over has over 30 years of combined experience in the industry, U.S. granted patents for liquid formulations under U.S. Patent #9730911, trademark extracts, and has earned over 81 cannabis awards during his career. The 5,000 sqft Non-Volatile Type - 6 Dual Licensed facility located in Oakland California, hosts an equity partnership and currently provides jobs for 20 diverse employees. Advesa utilizes several innovative technologies for mechanically extracting full spectrum extracts, cannabis terpenes, isolated compounds, and a wide range of infused marijuana products.

ADVESA began our successful economic empowerment incubation program three years ago in California and Jamaica and we hope to continue our product lines, retail goals, and economic empowerment mission in the State of Massachusetts.

1.5 COMPANY STRUCTURE

Advesa MA is a Massachusetts domestic for-profit corporation that intends to apply for a License from the Massachusetts Cannabis Control Commission to operate Marijuana Establishments, specifically Marijuana Retailers. Advesa will file, in the form and manner specified by the Commission, an application for licensure as a marijuana retailer consisting of three packets: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet (in addition to submission of the required fees), upon receipt of a Host Community Agreements and/or other locals approvals from target municipalities in the Commonwealth.

1.6 WHAT DRIVES US

Advesa's goals include providing safe and high-grade cannabis and extract products to consumers above the age of 21 while simultaneously advancing its goals of community reinvestment and hiring of individuals negatively impacted by cannabis prohibition. Our goals of economic empowerment drive us forward, and that drive will provide many individuals who have been denied employment opportunities because of a drug arrest record while also enriching the local economy. We are driven by our contributions to the local economy and community in which our facilities reside. By providing jobs to those with an arrest record or from an area of disproportionate impact as determined by the Commission we are directly contributing to their rehabilitation process and journey becoming a full-time member of the local workforce. We also will organize employee volunteer days as well as industry specific training classes to prospective employees, social equity program participants, and fellow economic empowerment priority applicants. Advesa has further committed to hiring 75% of its employees from communities designated by the CCC as disproportionately impacted by Controlled Substances Act enforcement, and neighborhoods with similar demographics in the City. Charitable giving is part of the company's ethos, as is uplifting and advancing disadvantaged individuals and communities.

1.7 REGULATORY COMPLIANCE

Advesa is applying to become a Marijuana Establishment, consistent with all directives in G. L. c. 94G and the Cannabis Control Commission's implementing regulations at 935 CMR 500.

Advesa will be registered to do business in the Commonwealth as a domestic for-profit corporation in compliance with 935 CMR 500.000 and maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue. Advesa will apply for all state and local permits and approvals required to renovate and operate the facility.

Advesa will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation and security. Advesa expects to benefit from close coordination with the Cambridge Planning Department, Community Development, and the Cambridge Police and Fire Departments, as well as local businesses and Cambridge City Councilors.

2.0 MANAGEMENT SUMMARY

2.1 OUR TEAM

Advesa will be operated by principals Jessica Pelletier, Tony Verzura, Michael Latulippe Tatiyana Benjamin, Isiah Benjamin, and Executive Director Shanel Lindsay.

Jessica Pelletier is a cannabis entrepreneur, owner of BIORELEIF LLC. D/B/AMJ&CO, a medical marijuana patient, advocate, and a Massachusetts leader advocating for economic empowerment applicants.

- Principal of Advesa CA, Inc. – *has fully funded and incubated two disproportionately impacted companies through Oakland, California’s Cannabis Equity Program.*
- Board of Directors – Treasurer, Northeast Cannabis Coalition
- Board of Directors – President, Connecticut for Safe Access
- CEO MJ&CO, est. 2015 – *trains Economic Empowerment applicants and licensure, compliance and business development.*
- Jessica understands the industry as a patient; having survived nine surgeries since age 18 to remove multiple tumors in her breasts and stomach.
- Jessica is an advocate for the promise of cannabis as a pain relief substitute to opioids.

Shanel Lindsay is a cannabis entrepreneur, Attorney, social justice warrior, and the founder of Ardent.

- Leading Advesa’s aggressive local hiring effort as Executive Director of Hiring will be Massachusetts cannabis activist, entrepreneur, and Cannabis Control Commission Advisory Board member Shanel Lindsay.
- A drafter of the ballot initiative that legalized adult use marijuana in Massachusetts, Lindsay is widely recognized as an uncompromising advocate for delivering on the Commonwealth’s promises to extend opportunities in the cannabis field to disproportionately impacted persons and persons of color.

Tony Verzura is a cannabis inventor and the owner of Blue River Terps, Prana Medicinals, and Advesa CA.

- Tony Verzura is a veteran innovator in the cannabis industry, bringing some twenty years of experience in cannabis cultivation and product development.
- Owner, US Patent #9730911, related to extraction of pharmaceutical components from plant materials
- Over \$35 million in cannabis sales experience
- Founder of A.C.T. Now, Prana Medicinals, Blue River Terpenes, NXTLVL, and Advesa CA

- Over 71 cannabis awards worldwide
- Regularly features on national and international news outlets, such as CNBC Money Talk, *Washington Post*, and more

Michael Latulippe is a cannabis advocate, Economic Empowerment applicant, and Advesa's Director of Business Development

- Appointed Member of the Cannabis Control Commission Advisory Board (2017 – 2021)
- Development Director and Patient Advocate, Massachusetts Patient Advocacy Alliance
- Vice President, MJ&CO, est. 2015
- President – Cannabis Society
- LGBTQ Advocate

Tatiana Benjamin is a resident and homeowner in the city of Brockton, MA, an Economic Empowerment applicant, and Advesa MA's Executive Director of Marketing and Public Relations.

- Tatiana holds a Master of Science in Integrated Marketing Communications. Tatiana has developed and successfully executed brand and strategic marketing plans for small businesses and organizations in MA, a few being Juice'd Café, The Makings of Mo Pasty & Catering, Malden Rising Leaders, and Commonwealth Office Supply.
- She is a National Account Manager in the Sales Division at Blue Cross Blue Shield of Massachusetts where she is responsible for the building and retaining relationships with her book of business of large clients Nationwide.
- Tatiana is an AFPA certified Health and Wellness Coach. With a passion for wellness, she is the creator of The Well-Being Bar - a platform that focuses on self-care, healthy eating, fitness tips, and how adult use marijuana has assisted in her wellness journey. She hosts free fitness classes and offers nutrition consulting to low-income individuals who do not have the ability to afford such services. She volunteers as a mentor to female youth that come from under-privileged families with the Big Sisters Association of Greater Boston. She also volunteers her time assisting local organizations in the greater Boston area, such as Playworks New England, The Greater Boston Food Bank, and South Shore Stars.

Isiah Benjamin is Advesa MA's Executive Director of Finance, he is a resident and homeowner in the city of Brockton, MA and an Economic Empowerment applicant.

- Isiah is a passionate financial wellness advocate and a Certified Financial Education Instructor. He founded The Benjamin Blueprint, an organization dedicated to teaching financial literacy to students and millennial professionals. Isiah also serves as a financial advisor in the community by hosting monthly workshops and seminars to help individuals and families develop financial plans and increase their financial well-being.

- In addition to his financial career, Isiah dedicates his free time to mentoring young men from predominately under-privileged, low-income, African American communities in the greater Boston area. Through the organization, Young Man with a Plan, he participates in Men of Color events, providing young men with a sense of brotherhood, focusing on enthusiasm, accountability, scholarship, and tenacity. Isiah also sits on career panels with the youth at Boston Green Academy, sharing his career journey and serving as a positive role model and resource for the students.

3.0 PRODUCTS AND SERVICES

ADVESA MA is an innovative cannabis retail and manufacturing company specializing in high end adult-use products that can be consumed for adult use use. Our products are made from whole plant cannabis varieties and do not use any chemical solvents in the entire process. ADVESA products are specially formulated and comprised of the highest-quality ingredients and production methods that equate to a variety of applications. Our proprietary and patent-protected products have won over 81+ cannabis awards in the last 10 years and have reached a global audience and following.

ADVESA's own product line will be carried in our dispensary, in conjunction with other leading licensed brands within the State of Massachusetts. Advesa will offer high-grade cannabis and extract products compliant with the guidelines and regulations set out by the Cannabis Control Commission. All products will be tested by state-licensed laboratories for pesticides, mold, metals, mycotoxins mildew, and microbials. In addition to traditional sativa, indica, and hybrid cannabis flower, will offer a wide range of products and services that will allow to serve customers with a wide variety of needs. Products intends to offer include, but will not be limited to:

1. Topical Salves
2. Creams and Lotion
3. Patches
4. Oral Mucosal/Sublingual Dissolving Tablets
5. Tinctures
6. Oral Sprays
7. Inhalation Ready to Use Solventless Hash Oils
8. Pre-Dosed Solventless Oil Vaporizers
9. Ingestion Capsules
10. Food and Beverages

3.1 RETAIL SALES AND STRATEGY

ADVESA'S retail sales strategy will be based on generating and maintaining long-term relationships with adult-use customers. To facilitate and secure these long-term relationships,

we will provide state-of-the-art cannabis containing products that utilize solvent-less manufacturing methods at competitive prices and employ a consistent supply of a diverse array of products in stock for both eventual rapid delivery and in-store pick up. ADVESA strives to provide a great customer experience by training staff on communication skills, company culture and best practices for resolving customer service issues. Offering a personalized customer service approach is a highly effective way of combating competition.

Our staff will be comprised of individuals who are passionate and educated about cannabis and will undergo education and training on industry best standards and practices. Dispensary employee selection and hiring will be focused on individuals whom can provide the highest quality of information to the consumer and care. Our company is dedicated to service quality and providing a high degree of information to customers in both an individual consultative and group format.

Through this training, a higher quality of customer service will be achieved. Additionally, Advesa will offer customers a unique retail experience by using technology to showcase products, in conjunction with a modern, streamlined interior retail space.

All staff will undergo extensive training in excess of the minimum required by 935 CMR 500.

3.2 ECONOMIC EMPOWERMENT SHELF SPACE

At least 15% of the shelf space in Advesa's retail locations will be reserved for flower cultivated by and products made by certified Economic Empowerment and Social Equity licensees. Advesa's proposed Cambridge location will also reserve shelf space for cultivators and/or producers located within the City.

3.3 INVENTORY MANAGEMENT

Inventory will reflect the projected needs of adult-use consumers. ADVESA will keep a real time inventory, through a Point of Sale System that will allow us to know what is on hand at every given moment. Our company will design inventory systems for review and comprehensive inventory counts. Management conduct weekly, monthly, and comprehensive annual inventory reviews. Our inventory model will include detailed tracking of all cannabis products.

3.4 CUSTOMERS

Advesa's target customers include consumers who are over the age of 21. Educational materials provided in store, on social media, and the company's website will inform consumers of the risks of cannabis use, as well as instructions for safe use and storage to prevent diversion.

3.5 DISPENSING CANNABIS

ADVESA Dispensary Facility agents are required to check the state-issued identification card or registration card for every customer and reserves the right to refuse service to those

without one, the other, or both. A qualified staff member will examine and verify the registration card and ID of the customer, and anyone under the age of 21 will be denied entry to the facility.

4. COMPANY DESCRIPTION

4.1 OPERATIONS

Advesa's second target marijuana retailer will be located in the city of Cambridge, where Advesa has an option to lease the site located at 966 Cambridge St. in the neighborhood known as Inman Square, located near three bus stop locations. Advesa envisions being a catalyst for economic vibrancy in the Inman Square area and surrounding neighborhoods.

The facility in Cambridge is well positioned, and it matches the ideal picture of a community dispensary store. Before taking over the facility, it was an underutilized glass manufacturing space. The space was not achieving its highest and best use. Advesa will be launching with one outlet in Cambridge but has plans to open two (2) other outlets in key locations in Massachusetts including Somerville.

4.2 INVENTORY CONTROL

Advesa will establish inventory controls and procedures for conducting inventory reviews and comprehensive inventories of marijuana products in the process of cultivation and finished, stored marijuana all of which will meet and exceed the measures in 935 CMR 500. Advesa will tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

4.3 INDEPENDENT LABORATORY TESTING

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories and documented as such in company records and the Commission's seed-to-sale system.

4.4 RECORDKEEPING

Advesa will maintain records, including all records required in any section of 935 CMR 500.000, which will be available for inspection by the Commission, upon request. The records will be maintained in accordance with generally accepted accounting principles and all applicable regulations. We will keep written and digital records on operating, procedures, inventory, tracking, personnel records, staffing plans, and detailed business and financial records.

4.5 LIABILITY INSURANCE

Advesa will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The

deductible for each policy shall be no higher than \$5,000 per occurrence. Advessa will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

4.6 WASTE STORAGE AND DISPOSAL

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements. This means, at minimum, that any waste containing marijuana will be grinded and mixed in a medium (such as with soil and other organic waste) to render the marijuana unusable and unrecognizable.

4.7 ENERGY EFFICIENCY

Advessa will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure. Advessa will be developing strategic partners to source its products and will consider energy efficiency a key criterion. Lighting will be on automated controls and will be used sparingly where natural light can be used in the store. Preventing light pollution at night is also one of our goals and will only light areas required by Commission regulation and have them adjust throughout the night. This is in line with Advessa's sustainability mission, and also results in cost savings.

4.8 SUREITY BOND

Prior to commencing operations, Advessa will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund to ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation. Advessa will comply with all local rules, regulations, ordinances, and bylaws. Advessa has a Host Community Agreement for the Cambridge location.

5.0 SECURITY

Advessa restricts access to any part of the site to persons who are over the age of 21 – *no exceptions*. In a secure entry room, monitored by security cameras, Advessa's thoroughly trained security personnel will perform an Identification Check using a 50-state ID scanner and a visual age verification prior to admitting any person onto the dispensary floor. No person will be admitted through the locked, secured entry to the dispensary floor without passing an ID scan and visual inspection. Advessa's electronic fraud detection scanners will be submitted for

approval to the Cambridge Police Department. A redundant ID check will be performed by a trained sales associate prior to registering any sale.

Advesa has contracted with the Edward Davis Company, led by former Boston Police Commissioner Ed Davis, to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community. Advesa also has subcontracted with a professional alarm company.

Advesa's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs.

BRIEF OVERVIEW OF FACILITY SECURITY SPECS

- Dispensary facility will have a comprehensive security, alarm, and video recording system to prevent and detect diversion, theft or loss of marijuana.
- We will maintain all security system equipment and recordings in a secure location to prevent theft, loss, destruction or alterations.
- All security equipment and systems will be tested weekly to ensure that systems are in working order.
- ADVESA will maintain the ability to remain operational during a power outage.
- All areas will have a clear sight path.
- All external facades and the perimeter of the facility will be well-lit.
- All security and safety components will adhere to local sitting requirements.
- All data storage and servers will be stored off- site in a secure server facility. These facilities will be government standard and designed by the industry leading data storage and security experts.
- Entryways and parts of exterior facades will be 3/4-inch steel reinforced with Kevlar and secured into 4' of cement. The front door to both entryway access and the sales floor will be framed with 1/3" 1.75"×4" C Channel steel. The front access room will be reinforced with bullet resistant fiberglass.
- Our security plan includes utilizing "buzz and entry" systems, i.e. fail\secure locks and electromagnetic locks that will not release even during power failure.
- Sales floor access to products will require keys and passwords to secure all products.

5.1 ALARM SPECS

- Duress alarm, meaning a silent security alarm system signal generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system.
- The company's intrusion protection includes panic buttons or panic alarms. These can be strategically placed throughout the facility– at the register, in the manager's office, or in the walk\ins. The average response time if these buttons are pressed is 7 minutes.

- Holdup alarm, or a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress.
- An automatic voice dialer, or any device capable of being programmed to send a prerecorded voice message, when activated, over a telephone line, radio or other communication system, to a law enforcement, public safety or emergency services agency requesting dispatch.
- Our facilities will require a back-up alarm system approved by the commissioner that shall detect unauthorized entry during times when no employees are present at the facility. This back up system will be provided by a company supplying commercial grade equipment but may not be the same company supplying our primary security system.
- A failure notification system that is capable of providing an audible, text or visual notification of any failure in the security or surveillance system. This failure notification system will provide an alert to our facility and managers within five minutes of the failure, either by telephone, email, or text message.
- Temperature monitoring devices, along with its smoke, heat and fire detectors.
- Sound based and motion-based alarms that enable security personnel to hear a break-in in progress and report live details to the responding police.

5.2 COMPREHENSIVE VIDEO SURVEILLANCE SPECS

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Cambridge Police Department by tie-in. These surveillance cameras will remain operational even in the event of a power outage.

- We will maintain a perimeter alarm, motion detector; and video cameras in all areas that may contain marijuana and at all points of entry and exit, which shall be appropriate for the normal lighting conditions of the area under surveillance. At all times, we will maintain the ability to immediately produce a clear color still photo that is a minimum of 9600 dpi from any camera image (live or recorded).
- There will be a date and time stamp embedded on all recordings. The date and time will be synchronized and set correctly so it will not significantly obscure the picture.
- All video recording will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will maintain the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also maintain the ability to be saved in an industry standard file format that can be played on a standard computer operating system. We will erase all recordings prior to disposal or sale of the facility.
- Our facility will limit access to surveillance areas to persons that are essential to surveillance operations, law enforcement agencies, security system service employees, the commissioner or the commissioner's authorized representative, and others when approved by the commissioner.

- We will make available a current list of authorized employees and service employees that have access to the surveillance room to the commissioner or the commissioner's authorized representative upon request.
- All facilities will keep all on-site surveillance rooms locked and will not use such rooms for any other function.
- Monitoring of movement indoors and outdoors with CCTV. This deters internal theft, damage or destruction of property, and discourages vandalism.
- All facilities will have comprehensive alarm systems. Video surveillance will include over 40 infrared security cameras directed at all approved safes, approved vaults, dispensing areas, marijuana sales areas and any other area where marijuana is being produced, harvested, manufactured, stored or handled.
- At entry and exit points, we will angle cameras to enable the capture of clear and certain identification of any person entering or exiting the facility.
- There will be twenty-four-hour recordings from all video cameras, which we will make available for immediate viewing by the commissioner or the commissioner's authorized representative upon request and will retain for at least thirty days.

5.3 SAFES & STORAGE

- All retail facilities will not maintain marijuana in excess of the quantity required for normal, efficient operation. We will maintain all marijuana in a secure area or location accessible only to specifically authorized employees, including only the minimum number of employees essential for efficient operation.
- All approved safes and approved vaults will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.
- All marijuana will be stored in an approved safe or approved vault and in such a manner as to prevent diversion, theft or loss.
- All locks and security equipment will be kept in good working order.
- The dispensary department will remain securely locked and protected from entry by unauthorized employees through the implementation of limited access areas. If diversion, theft or loss of marijuana has occurred from a dispensary facility, the commissioner shall determine the appropriate storage and security requirements for all marijuana in such dispensary facility and may require additional safeguards to ensure the security of the marijuana.
- Storage, safes, and vaults will be kept in secure rooms that will be reinforced and fireproof to ensure inventory and safe keeping of funds. Only 2 personnel will have access to these rooms through biometric security measures.

5.4 VISITORS

All agents and visitors will be required to visibly display an ID badge and will maintain a current list of individuals with access. On-site consumption of marijuana by employees and visitors will be prohibited, and a zero-tolerance will be implemented including outside the premises. Employees who consume on-site will be terminated, and visitors will be reported to the

Cambridge Police Department. Advesa will have a security personnel on-site during business hours.

5.5 CONTROLS TO PREVENT DIVERSION, THEFT, OR LOSS OF MARIJUANA

A. SECURITY CULTURE

Safety for consumers and the community is a key priority for our dispensary and management team. Legitimate and well-functioning cannabis facilities adopt a security culture to ensure safety and complete security. Security culture refers to a set of practices and strategies that work together to maintain community and facility standards. The “security culture” of our facility will involve the following elements:

- Employing professional, trained security personnel
- Staying alert to detect problems before they occur
- Educating consumers to be sure they know the rules
- Implementing policies to prevent diversion
- Restricting access to the facility to authorized persons
- Using appropriate security technology and equipment to monitor and secure the facility
- Maintaining communication with local law enforcement
- Training staff to prevent and respond to emergencies
- Educating staff and members as to their rights and responsibilities under the law.

Individually, these elements help make a dispensary safer. When coupled together, they provide a comprehensive safety strategy that makes a legitimate dispensary one of the best and most secure neighbors in any given community. Cannabis facilities carry out important work in a discrete and professional manner. Our stringent security measures and careful membership screening serves to protect our facility and the wider community from undesirable elements in general. In order for us as a company to be pro-active and ensure consumer safety, it is imperative that we self-regulate the adult use products that are being dispensed to consumers. Cannabis products intended for adult use must meet certain packaging, labeling, and sanitary requirements to guarantee safe consumption by our consumers.

B. LIMITED ACCESS AREAS

Limited access areas will be identified by clear signage (at least a 12x12 sign). Within the facility, there will be a diagram of the premises that displays Limited Access Areas, including walls, counters, storage areas, dispensing areas, and all entryways and exits. All employees and staff must wear identification badges at all times while working within the facility. If there are outside visitors, an identification badge must be obtained, and a registered dispensary agent must escort the visitor during their entire duration visiting the premise.

Many areas will be limited access areas that require key card and biometric hand recognition to gain entry. Executive offices, storage, security, and vaults will all have multiple access

requirements. These will all be secure areas that not only have strict access requirements, but all areas will be locked when not in use.

6.0 BENEFITS TO THE MUNICIPALITY

Advesa looks forward to working cooperatively with the City of Cambridge—which approved Ballot Question 4 in 2016 with a staggering amount of residents in favor of cannabis legalization—to ensure that the business operates as a responsible, contributing member of the community. Advesa anticipates establishing a mutually beneficial relationship with the City in exchange for permitting to site and operate in Cambridge. The City stands to benefit in various ways, including but not limited to the following:

- A. Jobs
 - A dispensing facility will add 25-35 full-time jobs, at least 75% of which will be staffed by persons from communities designated by the Cannabis Control Commission as “disproportionately impacted” by Controlled Substances Act enforcement or neighborhoods with similar demographics in Cambridge, persons with Drug CORI records, in addition to hiring qualified, local contractors and vendors.
- B. Monetary Benefits
 - A Host Community Agreement with significant monetary donations would provide the City with additional financial benefits beyond local property taxes.
- C. Access to Quality Product
 - Will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants
- D. Control
 - In addition to the CCC, the Police Department and other municipal departments will have oversight over security systems and processes.
- E. Responsibility
 - Advesa is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Cannabis Control Commission.
- F. Economic Development
 - Renovation and activation of 966 Cambridge St. that will help catalyze urban vibrancy in connection with the Inman Square neighborhood vicinity.

6.1 FACILITY AND ZONING- CAMBRIDGE

Advesa will remain compliant at all times with the local zoning requirements set forth in the Cambridge Zoning Ordinance, including the December 6, 2018 Ordinance Amending the Cambridge Zoning Ordinance to Amend Article 2.000, Section 4.35, Section 4.37, Section 4.40, Section 6.36.5, Section 6.36.7, and Section 11.800 Regarding Adult Use Marijuana Establishments.

Under the existing Cambridge Zoning Ordinance, Advesa's 966 Cambridge St. marijuana retail establishment will be located within BA ("Business A") zoning which is where adult use marijuana establishments are allowed. The marijuana zoning permits a marijuana retail establishment to be operated after obtaining a special permit and a license from the License Commission.

The proposed establishment complies with the adult use marijuana establishment-specific zoning requirements because:

- There are no K-12 Schools within 300 feet of the proposed establishment.
- There are no cannabis establishments within 1,800 feet of the proposed establishment.
- There are no playgrounds, athletic fields, or youth recreation facilities within 300 feet of the proposed establishment.
- Located in a permanent building.
- No packaging or re-packaging of cannabis products will occur on-site.
- Location and design of cannabis use will not detract from the sense of activity with opaque, unwelcoming façade at ground floor in retail areas.
- Loading, refuse and service areas are designed to be secure and shielded from abutting uses.
- Building and site are designed to be compatible with other buildings in the area and to mitigate any negative aesthetic impacts that might result from required security measures and restrictions on visibility into the building's interior.
- Advesa intends to install four short-term bicycle spaces (primarily for customer use) and two long-term bicycle spaces (for employee use). This proposal provides twice the number of spaces required by the Cambridge Zoning Ordinance.
- Any and all exterior alterations will be conducted in accordance with applicable zoning rules and regulations for cannabis retail stores. All door and window treatments that activate street frontage will promote transparency and visibility in the space and a lively neighborhood. We intend to work with Community Development Department staff to continue an ongoing review of any alterations being made to the building.
- We intend to hire a Community Engagement Director from the local neighborhood who will help us address any complaints from the community and give all abutters access to a specific number and email address to contact the director at any time. In addition to our required

community outreach meetings, we intend to host quarterly community engagement meetings to hear concerns from neighboring residents and businesses for at least the first year of operations.

- Signage will incorporate no internal illumination, be subject to review as part of the special permit process and conform to all requirements of 935 CMR 500 and G.L. c. 94C, § 34.

7. MARKET RESEARCH

7.1 CUSTOMERS

While cannabis in Massachusetts is predicted to be a \$450MM market in 2018 rising to as much as \$1.2B by 2021, there are still strict restrictions preventing operators from proliferating in the market. There are still few dispensaries with Final Licenses and Notices to Commence Operations from the Cannabis Control Commission, but a pipeline with dozens more marijuana retailers expected to be licensed within the coming months. Advesa expects to capitalize on an early mover advantage and distinguish itself from operating business with superior products, operational excellence, seamless access to public transit, and our focus on economic empowerment of individuals and communities harmed most by cannabis prohibition.

7.2 COMPETITORS

Advesa's main competitors include the licensed marijuana dispensaries that are currently operating in the metro Boston area.

7.3 COMPETITIVE ADVANTAGE

Advesa's competitive advantages over their competition include a team of executives who have decades of combined experience thriving in highly competitive retail markets. Additionally, all executives have extensive experience in the sale of high value products sold to both consumers and businesses as well as economically empowering those impacted by the War on Drugs.

ADVESA'S approach to cannabis is rooted in implementing innovative manufacturing and retail technologies, as well as standardizing cannabinoid-based products for adult-use. Our community leadership, management team's experience, and our history of delivering products without the use of any chemical solvents provides the company's competitive advantage. Additionally, our manufactured product lines in other states have won 81+ awards and are currently being used by thousands of recreational consumers globally. Our business model within both the retail and manufacturing space has been tried, tested and proven to work in other comparative markets

In every business, there is competition; however, the retail cannabis industry is known to be especially competitive. Advesa possesses several strengths which will allow us to stand apart

from our competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the services offered, the location of the dispensary, our mission to empower communities and individuals harmed by marijuana prohibition, and to some extent, the branding of the business.

7.4 SWOT ANALYSIS

The SWOT analysis provides us with an opportunity to examine the internal strengths and weaknesses ADVESA must address. It also allows us to examine the opportunities presented to the Company as well as potential threats that lie beyond its control.

The following strengths are internal to ADVESA:

STRENGTHS

- Combined 45 years of cannabis business experience stretching across a plethora of industry sectors, including dispensary management, marketing and sales, business development, ancillary product development, and cannabis consumer education and development.
- Qualified, professional management team that has demonstrated years of dedication to social justice issues within the cannabis space.
- FDA, ISO and OSHA compliant organization.
- Strong participation in community outreach and educational programs in Oakland, Jamaica, Connecticut, and the Boston-Metro Area.
- Committed compliance in use of cutting-edge industry technology application e.g., Seed to Sale tracking and accounting programs.
- Modern and ecofriendly approach to supplies, materials, packaging, labeling, etc.
- Committed and strong board of directors and advisors who are focused on fulfilling the company's mission and vision of both economic empowerment and best-in-class products.

WEAKNESSES

- Constantly changing local, state, and federal regulations concerning adult use cannabis businesses.
- Time and financial capital required to complete both local City and State licensing.
- Lack of reliable comprehensive market data.
- The cannabis industry being a historically uncharted and volatile market that can fluctuate aspects of business and consist of unachievable goals.
- Lack of potential collaborations with healthcare institutions due to federal governing laws.
- Limited resources for clinical studies and trials due to the costs of regulations requirements.

OPPORTUNITIES

- Overall declining state laws and a general acceptance amongst the public regarding cannabis use as a viable, safe, and natural application.
- Opportunity to serve the industries rapidly changing needs as they arise.

- “States Rule” now protects law-abiding and compliant cannabis institutions from most federal involvement.
- Massachusetts recreational use demand supersedes the supply available by the current number of cannabis operations.
- Due to our company’s focus on technologically advanced cannabis processing and dispensing, we have a forefront opportunity to service the demand of recreational consumers.
- With continued demand growing, competition in the market will remain low and stable

THREATS

- The continuing black market with the prices and supply it provides.
- State and city levied taxes that have a potential to increase and affect the end consumers’ prices.
- The remaining societal stigma about cannabis. Our company will continue to work through organizations and public outreach to help the ongoing effort to inform and educate while preventing underage use.
- Federal government possibly removing their policies and changing their stance which could out monopolies, or pharmaceutical companies that have been waiting on the sidelines in place of the individual small businesses.
- Uneducated and irresponsible users contributing to statistical data contributing to cannabis use.

7.5 MARKETING PLAN

BRANDING AND POSITIONING

ADVESA’S approach to cannabis manufacturing and retail is designed to better meet the needs of consumers who seek a modern, clean, safe and professionally managed facility for obtaining cannabis and cannabis-derived products. General differentiators that appeal to adult use consumers will include the following:

- **USE OF CURRENT TECHNOLOGY** ADVESA utilizes point-of-sale software and bar/coding technology to help manage its transactions, accounts, security, and track inventory. This technology provides more information and personalized control to help us make informed decisions about how to better serve consumers.
- **HIGHER QUALITY & VARIETY OF PRODUCT** The key to sales and business popularity lies within the quality and variety of cannabis dispensed. Customer buying patterns have revealed that consumers prefer to have a wide variety of products to choose from as well as competitive pricing. Our management team will focus on selecting, testing, and distributing safe, high-quality products grown and manufactured with sustainable and solvent-free processes.

- **EMPHASIS AND DEMONSTRATED EXPERIENCE IN ECONOMIC EMPOWERMENT** ADVESA’S ownership is comprised of a diverse group of cannabis professionals whom maintain a robust track record in activism related to social justice, Drug War reparations, and economic empowerment within the cannabis space. Our commitment to empowering individuals disproportionately impacted by the war on drugs spans many states and multiple countries and will continue within our operations within the State of Massachusetts.
- **SERVICE ORIENTATION** Aside from offering a wide product selection, offering top-notch customer service is a highly effective way of combating competition. Our staff will be comprised of personable individuals who are trained on best standards and practices and are capable of providing the highest quality of customer service. Our company is dedicated to service quality and providing a high degree of information to consumers in both a consultative and group format.
- **FOCUS ON HOLISTIC HEALING AND RESPONSIBLE USE** ADVESA emphasizes quality of life, health, and healing—not the drug culture. We are a member-focused community of cannabis and social justice professionals whose mission is to help our consumers obtain safe product and achieve the highest possible quality of life.
- **RELIANCE ON INFORMATIVE MERCHANDISING** ADVESA maintains a personalized approach to retail sales and productizing. Service is tailored and matched to consumers’ individual needs. This includes giving customers a variety of choices in neatly arranged cases, packaging product in childproof and containers that display informative labels and allowing consumers to see product up close while making a purchase decision.

8. SALES

8.1 GROWTH STRATEGY

Advesa’s plan to grow the company includes hosting community events, engaging adult-use consumers via social media, creating a unique retail destination, and creating unique products that appeal to an ever-evolving demographic. Our key customer base will be adult cannabis consumers. This customer base includes a wide variety of individuals who seek to use cannabis for adult use purposes.

Word-of-mouth marketing due to streamlined dispensary operations and a diverse product selection is the most prominent way to garner consistent sales in the adult use cannabis industry. Upon opening, ensuring that dispensary operations are consistent, safe, and quick will aid in ongoing consumer purchases. Ensuring that staff members are properly trained in products, applications, and consumer needs also establishes long term relationships and sales.

8.2 COMMUNICATION

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

All marketing, advertising and branding produced by or on behalf of Advesa shall include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."

Advesa will communicate with our customers via social media, telephone and opt-in email lists. Advesa will also provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

8.3 PRODUCT SALES

Advesa will sell its product and service by analyzing market trends and creating products that meet the demands of the ever-changing cannabis market. Advesa will further promote its brand by utilizing a proprietary state of the art e-commerce platform currently under development.

Advesa will ensure that all marijuana products that are provided for sale to consumers are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: "INCLUDES MULTIPLE SERVINGS." Advesa will not sell multiple serving beverages and each single serving of an

edible marijuana product contained in a multiple-serving package shall be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

8.4 CUSTOMER RELATIONSHIP PLAN

ADVESA's retail sales strategy will be based on generating and maintaining long-term relationships with customers. The most important method of facilitating and maintaining these long-term relationships lies within continued, positive interactions between customers, the community, and dispensary staff and sales agents. Training our staff in both informative merchandising and an individualized and personal approach to sales is one of the ways in which we will ensure that our staff represents this mission.

8.5 LOGO

Advesa has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

The logo is discreet, unassuming, and does not use medical symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana. A sample of the logo can be found below:

ADVESA
MASSACHUSETTS

9. FINANCIAL PROJECTIONS

9.1 Projections for Cambridge Facility

Fiscal Year	FIRST OPERATIONAL YEAR PROJECTIONS 2019 (6mth of operations)	SECOND OPERATIONAL YEAR PROJECTIONS 2020	THIRD OPERATIONAL YEAR PROJECTIONS 2021
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ADVESA MA BUSINESS PLAN

Projected Revenue	\$ 1,950,000	\$ 4,875,000	\$ 5,850,000
Projected Expenses	\$ 1,365,000	\$ 3,412,500	\$ 4,095,000
Projected EBITDA:	\$ 585,000	\$ 1,462,500	\$ 1,755,000
Number of customer visits for the year	26,000	65,000	78,000
Projected % of customer growth rate annually	---	25%	20%
Estimated cost per transaction (retail)	\$ 75.00	\$ 75.00	\$ 75.00
Total FTEs in staffing	15	20	25



Separating Recreational from Medical Operations

Advesa MA, Inc. ("Advesa") is not currently applying to become a medical marijuana treatment center and therefore this does not apply.



Plan for Restricting Access to Age 21 and Older and Prevent Diversion

Prevention of product diversion permeates all of Advesa's operating policies and procedures. These detailed policies and procedures include:

- Advesa will undertake verification of every person's identification with a 50-state electronic fraud scanner by trained security personnel in a secured vestibule to ensure that only individuals 21 years or older are permitted inside the marijuana establishment.
- All employees and registered agents must be 21 years of age or older as per *935 CMR 500.029 or 500.030*.
- Advesa will impose an absolute prohibition on providing samples or giving away marijuana to consumers.
- Advesa marijuana establishment employees will be trained on crime prevention techniques pursuant to 935 CMR 500.105(1)(b).
- There will be immediate dismissal and referral to police for any employee or other person found to be engaged in diversion, with any such incidents immediately reported to law enforcement and to the CCC pursuant to 935 CMR 500.105(1)(l).
- Employees will complete a state-certified responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors, for all Advesa employees involved in the handling and sale of marijuana for adult use.
- Advesa will comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- All display samples of each product offered for sale will be displayed in secure, locked cases, subject to the requirements of 935 CMR 500.110.
- Advesa will only engage in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana and will comply with all other marketing and advertising requirements under 935 CMR 500.105(4) and meet additional public health and safety criteria imposed by Advesa's marketing director.
- Warning statements required by the CCC's regulations will be affixed to all applicable products, and all labels will comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5). Advesa will have independent retail-level quality assurance protocols to assure any third-party product offered for sale meets labeling regulations.
- Tamper or child-resistant packaging will be used for applicable marijuana products, and all products will comply with all other packaging of marijuana and marijuana products



requirements under 935 CMR 500.105(6) as verified by Advesa's independent quality assurance verification procedures.

- Advesa will maintain real-time inventory and will track and tag all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner approved by the CCC.
- All records will be kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and waste disposal, and Advesa comply with all other record keeping requirements under 935 CMR 500.105(9).
- Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, will be stored in a separate area, until such products are destroyed, and Advesa will comply with all other storage requirements under 935 CMR 500.105(11).
- Two or more marijuana establishment agents will witness and document how the marijuana waste is disposed or otherwise handled, and Advesa will comply with all other secure waste disposal requirements under 935 CMR 500.105(12).
- All marijuana products transported to Advesa will be linked to the seed-to-sale tracking program, with Advesa attentiveness to assurance that all vehicles transporting marijuana will be staffed with a minimum of two marijuana establishment agents; and any vehicle accidents, diversions, or other reportable incidents that occur during transport will be reported to the CCC and law enforcement within 24 hours. Advesa understands its duty to be diligent in assuring its suppliers will comply with all other transportation requirements under 935 CMR 500.105(13).
- All security requirements under 935 CMR 500.110 will be followed, including:
 - Implementing sufficient safety, security and surveillance measures (as described in Advesa's Security Plan) to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at Advesa's facilities.
 - Adopting procedures to prevent loitering and to ensure that only individuals engaging in activity expressly or by necessary implication permitted by the CCC's regulations and its enabling statute are allowed to remain on the premises.
 - Storing all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss.



- Restricting access to employees, agents or volunteers specifically permitted by Advessa, agents of the CCC, state and local law enforcement and emergency personnel, and all other limited access areas requirements under 935 CMR 500.110(4).
- Implementing an adequate security system to prevent and detect diversion, theft or loss of marijuana, notifying law enforcement and the CCC within 24 hours of a diversion, theft or loss of any marijuana product, and all other security and alarm requirements under 935 CMR 500.110(5); and
- Obtaining, at Advessa's own expense, a security system audit by a vendor approved by the CCC, and all other security audits requirements under 935 CMR 500.110(8).
- All other operating requirements under 935 CMR 500.140 will be followed, including:
 - Limiting sales to one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.
 - Utilization of a point-of-sale (POS) system approved by the CCC, in consultation with the Department of Revenue.
 - Providing educational materials to consumers stating that they may not sell marijuana to any other individual and that includes information regarding penalties for possession and distribution of marijuana in violation of Massachusetts law.



Quality Control and Testing

Advesa will comply with the all sanitary requirements for marijuana retailers, as well as its own cleanliness and hygiene protocols. Any Advesa agent whose job includes contact with marijuana or marijuana infused products is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible MIPs will be handled and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000, where applicable. As a marijuana retailer, Advesa will not be preparing or processing any marijuana or MIPs, but rather selling those products at retail.

Advesa agents working in direct contact with any marijuana or marijuana products will maintain adequate personal cleanliness and wash hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.

Advesa's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Likewise, Advesa will ensure that litter and waste is properly removed and disposed of, so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

Advesa's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair and will have adequate safety lighting in any areas where equipment or utensils are cleaned. Overall, the building, fixtures, and other physical facilities will be maintained in a sanitary condition.

Contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency, in accordance with labeled instructions.

Readily-accessible toilet facilities will be maintained in a sanitary condition and in good repair and storage practices will ensure that products that can support the rapid growth of undesirable microorganisms are held in a manner that protects them against the growth of these microorganisms or other contamination.

Advesa will have written and well-established policies and procedures for immediately responding to voluntary and mandatory recalls of any products carried by Advesa. Advesa will assign a point of contact to receive reports of voluntary and mandatory recalls, or other public health reports, and this staff person will also monitor relevant sources of procedures. Once a recall is triggered, Advesa will immediately quarantine the affected product, document the actions taken, and report as required.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and all applicable state and local statutes, ordinances, and regulations.

Advesa will not sell or otherwise market any marijuana or MIPs that have not first been satisfactorily tested by Independent Testing Laboratories, unless allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160, and labeled as such. Advesa will independently monitor independently testing protocols and procedures of its wholesale providers through its quality assurance program. Advesa is not a marijuana cultivator nor product manufacturer.



Personnel Policies Including Background Checks

Introduction

Advesa will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. At a minimum, Advesa will maintain the following personnel records: 1) job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions; 2) personnel records for each marijuana establishment agent; 3) a staffing plan that will demonstrate accessible business hours and safe conditions; 4) personnel policies and procedures; and 4) all background check reports obtained in accordance with 935 CMR 500.030.

Advesa will employ marijuana agents to fill the following job roles for its marijuana retailer facility in Cambridge:

1. Store Manager
2. Human Resources Manager
3. Security Manager
4. Security Guard(s)
5. Sales Associate(s)
6. Inventory Associates(s)

Marijuana Agent Personnel Records

Personnel records for each marijuana agent (as defined in 935 CMR 500.002) will be maintained for at least twelve (12) months after termination of the agent's affiliation with Advesa and will include, at a minimum, the following: 1) all materials submitted to the CCC pursuant to 935 CMR 500.030(2); 2) documentation of verification of references; 3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision of the marijuana agent; 4) 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; 5) documentation of periodic performance evaluations; 6) records of any disciplinary actions taken; 7) notice of completed responsible vendor and eight-hour related duty training; 8) results of initial background investigation, including CORI reports; and 9) documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident. These personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent's manager or members of the executive management team.

Marijuana Agent Background Checks

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In addition to completing the CCC's agent registration process, all agents hired to work for Advesa will undergo a detailed background investigation prior to being granted access to Advesa's Cambridge marijuana retailer facility or beginning work duties. Background checks will be conducted on all agents in their capacity as employees or volunteers for the Cambridge retailer facility pursuant to 935 CMR 500.100 and will be used by the Security Manager, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: CORI Registration and the CCC for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), Advesa will consider: 1) all conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction; 2) all criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation (juvenile dispositions will not be considered as a factor for determining suitability); and 3) where applicable, all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.

Advesa will make employment suitability determinations in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Advesa will:

1) comply with all guidance provided by the CCC and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination;

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

1. Time since the offense or incident;
2. Age of the subject at the time of the offense or incident;
3. Nature and specific circumstances of the offense or incident;
4. Sentence imposed and length, if any, of incarceration, if criminal;
5. Penalty or discipline imposed, including damages awarded, if civil or administrative;
6. Relationship of offense or incident to nature of work to be performed;
7. Number of offenses or incidents;
8. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
9. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of

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the offense including, but not limited to, professional or educational certifications obtained; and

10. Any other relevant information, including information submitted by the subject; and

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

Upon adverse determination for a particular applicant, Advessa will provide the applicant a copy of his/her background screening report and a pre-adverse determination letter providing the applicant with a copy of their right to dispute the contents of the report, who to contact to do so and the opportunity to provide a supplemental statement. After 10 business days, if the applicant does not dispute the contents of the report and no applicant-provided statement gives cause to alter the suitability determination, an adverse action letter will be issued providing the applicant information on the final determination made by Advessa along with any legal notices required. All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the CCC.

Advessa will cause its background screening to be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the CCC. Any references provided by the marijuana agent will be verified at the time of hire. As deemed necessary, individuals in to be hired for key Advessa positions with unique and sensitive access (e.g., members of the executive management team) will undergo additional screening, which may include interviews with prior employers and/or colleagues. As a condition of continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Registration Cards (as that term is defined in 935 CMR 500.002) annually and submit to other background screening as may be required by Advessa or the Commission.

Maintenance of Confidential Personnel Records

Advessa takes the control and privacy of our personnel very seriously. Personnel records will be maintained and only accessible via electronic encryption by the Human Resources Manager through cold storage which will be included as part of our required onsite storage system. The Human Resources Manager will be tasked with maintaining this confidential information and providing the dissemination of such information if required from the cold storage system maintained onsite. Advessa will implement an audit trail with its cold storage system to log and record every time it is accessed by the Human Resources Manager and what documents were either obtained or added. Advessa will abide by all rules and regulations required by the Commission to provide access to records and/or maintain confidentiality of those records.

Staffing Plan and Business Hours

Hiring and Recruitment

Advesa's Human Resource Manager will engage the executive management team and supervisory staff on a regular basis to determine if vacancies are anticipated and whether specific positions need to be created in response to company needs. Advesa's hiring practices will include but are not limited to the following and apply to all types of working situations including hiring, firing, promotions, harassment, training, wages and benefits:

1. Equal Employment Opportunity Commission (EEOC) Compliance;
2. Advesa's Diversity Plan;
3. Advesa's Plan to Positively Impact Areas of Disproportionate Impact;
4. Background Checks and References;
5. Mandatory reporting of criminal convictions (and termination if necessary);
6. State and Federal Family Leave Act;
7. Workplace Safety Laws;
8. State and Federal Minimum Wage Requirements;
9. Non-Disclosure and Non-Complete Agreements

Standards of Employee Conduct

Advesa's mission is to provide a professional workplace free from harassment and discrimination for employees. Advesa has a zero-tolerance policy on harassment or discrimination based on sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance. Harassment or discrimination on the basis of any protected trait or characteristic contravenes Advesa's Code of Conduct. A broad range of behavior could constitute harassment and/or discrimination. In general, harassment is any verbal or physical conduct that: 1) has the purpose or effect of creating an intimidating, hostile, or offensive working environment; 2) as the purpose or effect of unreasonably interfering with an individual's work performance; or 3) adversely and unjustifiably affects an individual's employment opportunities.

Employees are expected to maintain the highest degree of professional behavior. All harassment or discrimination by employees is strictly prohibited. Furthermore, harassing or discriminatory behavior of non-employees directed at Advesa's employees or customers also is condemned and will be promptly addressed.

Violence and Weapons in the Workplace

Any and all acts of violence in the workplace will result in immediate dismissal of the employee, customer, or parties involved. The Cambridge Police Department and other law enforcement authorities, as applicable, will be contacted immediately in the case of a violent event. Weapons are not permitted at Advesa's marijuana retailer establishment by employees, customers, or any other parties. Agents (including employees) found carrying weapons at Advesa's facility will be

immediately terminated. Vendors or other visitors to the facility found carrying weapons on the premises will be asked to leave and/or the police will be notified accordingly.

Alcohol, Smoke, and Drug-Free Workplace Policies

It is the Policy of the Advessa MA, Inc. to provide employees with a working environment that is free of the problems associated with the use and abuse of alcohol, tobacco, and of other controlled substances. The use of alcohol, tobacco, marijuana, or controlled substances is inconsistent with the behavior expected of employees as an unacceptable risk for workplace accidents or other failures that could undermine Advessa's ability to operate effectively and efficiently.

A. The following is prohibited:

1. Off-Duty: Any use, sale, possession, distribution, dispensation, manufacture, or transfer of controlled substances or marijuana, except, in the case of marijuana, where authorized by Massachusetts law.
2. On Duty: Any consumption of alcohol, tobacco, controlled substances, marijuana whether on or off Advessa property, or at any other worksite where employees may be assigned, or elsewhere during work hours.
3. The use of controlled substances, tobacco, or marijuana, or any use of alcohol on non-working time, to the extent that such use: (i) impairs an employee's ability to perform the employee's job; (ii) adversely impacts the safety of the employee or others; (iii) or affects the reputation of Advessa to the general public or otherwise threatens its integrity.

B. Employees who are convicted of substance-related violations under state or federal law in the workplace, including alcohol or marijuana related violations, or who plead guilty or *nolo contendere* to such charges, must inform their department head or manager within five (5) days of such conviction or plea. Department heads or managers shall immediately notify the chief executive and administrative officer.

C. Employees who are convicted or who plead guilty or *nolo contendere* to such drug-related violations or are found to have consumed or be impaired by controlled substances, marijuana or alcohol while on-duty, may be required to successfully complete a substance abuse or similar program as a condition of continued employment or re-employment with Advessa.

D. All employees must sign a statement acknowledging that they have been informed of the rules and requirements of our Drug-Free Workplace requirements.

EMPLOYEE ASSISTANCE PROGRAM

Advessa recognizes drug and alcohol dependency as an illness and a major public health problem. To that end, Advessa encourages affected individuals to voluntarily seek medical help. Employees who wish to obtain help in dealing with such problems may contact the head of Human Relations and ask about the Employee Assistance Program. Advessa may independently refer an employee

to the Employee Assistance Program or other substance use/abuse counseling agency or program for help, particularly where there is a pattern of deteriorating job performance or excessive absenteeism of the employee associated with substance use/abuse.

SANCTIONS

Substance use/abuse, however, does not relieve an employee of job performance standards and obligations. Violations of any and all provisions of this Policy may result in disciplinary action, up to and including termination from employment.

At-Will Employment

In the state of Massachusetts, employment is assumed to be at-will unless otherwise stated. At-will employment implies that employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Wrongful termination may be more difficult to prove in an at-will arrangement because of the freedom that each party has to end the employment. However, there are still many instances wherein a termination or discharge can be called wrongful, even in an at-will employment.

Workplace Attire

The required attire for registered marijuana agents at Advesa's facility varies based upon required duties. New hire training will define appropriate attire for each role and the Human Resources Manager will be responsible for ensuring compliance with all requirements is met.

Business Hours

Operating hours will be decided by the City of Cambridge.

Overview of Personnel Policies and Procedures Standard Employment Practices

Advesa values and thrives off of the contributions of its management and staff positions. Advesa intends to be a market leader in workplace satisfaction by offering competitive wage and benefits packages and nurturing a corporate culture that values meaningful work-life balance, complete transparency and accountability and service to the Cambridge community.

Advancement

The organization will be structured in a relatively flat manner, with promotional opportunities within each department. Participation in training and bi-annual performance evaluations will be critical for any promotions or pay increases. Advesa pledges to be an equal opportunity employer and advancer of its employees. See Advesa's Diversity Plan for greater detail.

Written Policies

Advesa's written policies will address, inter alia, the Family and Medical Leave Act (FMLA), the Consolidated Omnibus Budget Reconciliation Act (COBRA), equal employment opportunity, discrimination, harassment, the Employee Retirement Income Security Act (ERISA), disabilities, maintenance of personnel files, privacy, email policy, 935 CMR 500.000 et. seq., holidays, hours, sick time, personal time, overtime, performance reviews, disciplinary procedures, working hours, pay rates, overtime, bonuses, veteran preferences, drug testing, personnel policies, military leaves of absence, bereavement leave, jury duty, CORI checks, smoking, HIPAA, patient confidentiality, and compliance hotline.

Investigations

Advesa will develop policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay remain compliant with 935 CMR 500.000 et. seq.

Designated Outside Counsel

Advesa may retain counsel specializing in employment law to assist the Human Resources Manager with any issues and questions.

Job Status

Job Classifications

Positions at Advesa are categorized by rank and by department. Advesa's executive management team oversees the overall success toward achieving the company's mission. Advesa's founders, Jessica Pelletier and Tony Verzura, are responsible for implementation of the mission and the greater executive management team is responsible for ensuring that all departments are properly executing their functions and responsibilities. Job classification is comprised of three rank tiers: Executive Management, Management/Supervisors, and Non- Management Employee Staff.

Work Schedules

Work schedules will be either part-time, full-time, or salaried depending on an individual's situation.

Mandatory Meetings and Community Service Days

There will be a mandatory reoccurring company-wide meeting on a quarterly basis. All full-time employees will be notified of their required attendance. Advesa will also organize and encourage employee participation in community service activities in Cambridge. Advesa pledges to pay employees for up to two community service days per calendar year.

Breaks

Daily breaks, including lunch breaks, will comply with the laws of Massachusetts law.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month intervals for new employees during the first year of employment and at 6-month intervals thereafter. A written review will be provided to, and signed by, the employee under review. Reviews must be retained in each employee's personnel file and treated as a personnel record in accordance with Advessa's Recordkeeping Policies. Performance reviews must take into account positive performance factors and areas requiring improvement. Scoring systems may be utilized to help reflect the employee's overall performance.

Leave Policies

Advessa's leave policies will comport with all state and federal laws. All full-time employees will receive two 40-hour weeks of paid vacation per annum. Additional leave must be requested at least 2 weeks in advance and approved by the employee's department manager. Advessa will position applicable department manager and the supervising executive manager. It is the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage but does not exceed what is required for full implementation of operations. The department manager will also ensure that adequate coverage occurs on a daily basis and does not lead to unnecessary utilization of overtime coverage. Schedules will be set according to the needs of each department as determined by the determine which holidays will be observed and which departments will not be required to work. Advessa will offer paid maternity leave. Additional leave will not be paid and must be approved by the department manager.

Advessa anticipates observing the following holidays:

- • New Year's Day;
- • Martin Luther King Day;
- • Presidents' Day;
- • Memorial Day;
- • Independence Day;
- • Labor Day;
- • Thanksgiving; and
- • Christmas Day.

Disciplinary Policies

Purpose

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Advesa's discipline policy and procedure is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. The steps outlined below have been designed for consistency with Advesa's organizational values, best practices, and employment laws.

Advesa reserves the right to combine or skip steps depending upon facts of each situation and the nature of the offense – each offense will be reviewed and remediated on a case-by-case basis. The level of disciplinary intervention may also vary. The procedure outlined below is intended to provide guidance to the Advesa Human Resources Manager and executive management team and not bind them in any given disciplinary scenario. Some of the factors that will be considered depend upon whether the offense is repeated despite coaching, counseling, and/or training; the employee's work record; and the impact the conduct and performance issues have on Advesa's organization.

Procedure

Step 1: Counseling and Verbal Warning

Step 1 creates an opportunity for the immediate supervisor to schedule a meeting with an employee to bring attention to the existing performance, conduct, or attendance issue. The supervisor should discuss with the employee the nature of the problem or violation of company policies and procedures. The supervisor is expected to clearly outline expectations and steps the employee must take to improve performance or resolve the problem.

Within five business days, the supervisor will prepare written documentation of a Step 1 meeting. The employee will be asked to sign the written documentation. The employee's signature is needed to demonstrate the employee's understanding of the issues and the corrective action needed.

Step 2: Written Warning

While it is hoped that the performance, conduct, or attendance issues that were identified in Step 1 have been corrected, Advesa recognizes that this may not always be the case. A written warning involves a more formal documentation of the performance, conduct, or attendance issues and consequences.

During Step 2, the immediate supervisor and a department manager or director will meet with the employee and review any additional incidents or information about the performance, conduct, or attendance issues as well as any prior relevant corrective action plans. Advesa management will outline the consequences for the employee of his or her continued failure to meet performance and/or conduct expectations. A formal performance improvement plan (PIP) requiring the employee's immediate and sustained corrective action will be issued within five business days of a Step 2 meeting. A warning outlining that the employee may be subject to additional discipline up to and including termination if immediate and sustained corrective action is not taken may also be included in the written warning.

Step 3: Suspension and Final Written Warning

There may be performance, conduct, or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace. When immediate action is necessary to ensure the safety of the employee or others, the immediate supervisor may suspend the employee pending the results of an investigation.

Suspensions that are recommended as part of the normal progression of this progressive discipline policy and procedure are subject to approval from a next-level manager and the Human Resources Manager.

Depending upon the seriousness of the infraction, the employee may be suspended without pay in full-day increments consistent with federal, state and local wage-and-hour employment laws. Nonexempt/hourly employees may not substitute or use an accrued paid vacation or sick day in lieu of the unpaid suspension. Due to Fair Labor Standards Act (FLSA) compliance issues, unpaid suspension of salaried/exempt employees is reserved for serious workplace safety or conduct issues. The Human Resources Manager will provide guidance so that the discipline is administered without jeopardizing the FLSA exemption status.

Pay may be restored to the employee if an investigation of the incident or infraction absolves the employee.

Step 4: Recommendation for Termination of Employment

The last and most serious step in the progressive discipline procedure is a recommendation to terminate employment. Generally, Advesa will endeavor to exercise the progressive nature of this policy by first providing warnings, a final written warning, and/or suspension from the workplace before proceeding to a recommendation to terminate employment. However, Advesa reserves the right to combine and skip steps depending upon the circumstances and severity of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action.

Management's recommendation to terminate employment must be approved by the Human Resources Manager and department manager or designee. Final approval may be required from the CEO or designee.

Notwithstanding the foregoing, nothing in this policy provides any contractual rights regarding employee discipline or counseling nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between Advesa and its employees.

Appeal Process

Employees will have the opportunity to present information that may challenge information management has used to issue disciplinary action. The purpose of this process is to provide insight into extenuating circumstances that may have contributed to the employee performance

and/or conduct issues while allowing for an equitable solution. If the employee does not present this information during any of the step meetings, he or she will have five business days after that meeting to present information.

Performance and Conduct Issues Not Subject to Progressive Discipline

Behavior that is illegal is not subject to progressive discipline and may be reported to the Cambridge Police Department or other law enforcement authorities. Theft, intoxication at work, fighting and other acts of violence are also not subject to progressive discipline and are grounds for immediate termination.

Documentation

The employee will be provided copies of all progressive discipline documentation, including all performance improvement plans. The employee will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents. Copies of these documents will be placed in the employee's official personnel file.

Immediate Expulsion

Advesa maintains a policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor.

Separation of Employment

Separation of employment within an organization can occur for several different reasons. Employment may end as a result of resignation, retirement, release (end of season or assignment), reduction in workforce, or termination. When an employee separates from Advesa, his or her supervisor must contact the Human Resources Manager to schedule an exit interview, typically to take place on employee's last workday.

Types of Separation

1. Resignation

Resignation is a voluntary act initiated by the employee to end employment with Advesa. The employee must provide a minimum of two (2) weeks' notice prior to resignation. If an employee does not provide advance notice or fails to actually work the remaining two weeks, the employee will be ineligible for rehire and will not receive accrued benefits. The resignation date must not fall on the day after a holiday.

2. Retirement

An employee who wishes to retire is required to notify his or her department director and the Human Resources Manager in writing at least one (1) month before planned retirement date. It is the practice of Advesa to give special recognition to valued employees at the time of their retirement.

3. Job Abandonment

An employee who fails to report to work or contact his or her supervisor for two (2) consecutive workdays will be considered to have abandoned the job without notice effective at the end of the employee's normal shift on the second day. The department manager will notify the Human Resources Manager at the expiration of the second workday and initiate the paperwork to terminate the employee. Employees who are separated due to job abandonment are ineligible to receive accrued benefits and are ineligible for rehire.

4. Termination

Employees of Advesa are employed on an at-will basis, and the company retains the right to terminate an employee at any time.

5. Reduction in Workforce

An employee may be laid off due to changes in duties, organizational changes, lack of funds, or lack of work. Employees who are laid off may not appeal the layoff decision through the appeal process.

6. Release

Release is the end of temporary or seasonal employment. The Human Resources Manager, in consultation with the department manager, will inform the temporary or seasonal worker of their release according to the terms of the individual's temporary employment.

7. Expulsion

Advesa maintains a policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor.

Exit Interview

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The separating employee will contact the Human Resources Manager as soon as notice is given to schedule an exit interview. The interview will be on the employee's last day of work or other day, as mutually agreed upon.

Return of Property

The separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, facility access cards, computers, and identification cards. Failure to return some items may result in deductions from final paycheck. An employee will be required to sign the Wage Deduction Authorization Agreement to deduct the costs of such items from the final paycheck.

Termination of Benefits

An employee separating from Advesa is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Any accrued vacation and/or accrued sick leave will be paid in the last paycheck.

Health Insurance

Health insurance terminates on the last day of the month of employment, unless the employee requests immediate termination of benefits. Information about the Consolidated Omnibus Budget Reconciliation Act (COBRA) continued health coverage will be provided. Employees will be required to pay their share of the dependent health and dental premiums through the end of the month.

Rehire

Former employees who left in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to the Human Resources Manager, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying exam and current registration with the Commission, when required.

Department managers must obtain approval from the Human Resources Manager or designee prior to rehiring a former employee. Rehired employees begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals, or any other benefits. An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Compensation

Advesa believes that it is in the best interests of both the organization and its employees to fairly compensate its workforce for the value of the work provided. Advesa intends to use a

compensation system that will determine the current market value of a position based on the skills, knowledge, and behaviors required of a fully competent incumbent. The system used for determining compensation will be objective and non-discriminatory in theory, application and practice. The company has determined that this can best be accomplished by using a professional compensation consultant, as needed, and a system recommended and approved by the executive management team.

Selection Criteria

1. The compensation system will price positions to market by using local, national, and marijuana-industry specific survey data.
2. The market data will primarily include marijuana-related businesses and will include survey data for more specialized positions and will address significant market differences due to geographical location.
3. The system will evaluate external equity, which is the relative marketplace job worth of every marijuana-industry job directly comparable to similar jobs at Advessa, factored for general economic variances, and adjusted to reflect the local economic marketplace.
4. The system will evaluate internal equity, which is the relative worth of each job in the organization when comparing the required level of job competencies, formal training and experience, responsibility and accountability of one job to another, and arranging all jobs in a formal job-grading structure.
5. Professional support and consultation will be available to evaluate the compensation system and provide on-going assistance in the administration of the program.
6. The compensation system must be flexible enough to ensure that the company is able to recruit and retain a highly qualified workforce, while providing the structure necessary to effectively manage the overall compensation program.

In addition to the above-referenced guidelines, Advessa will utilize as its minimum wage the amount established under Cambridge Ordinance, unless superseded by Massachusetts or federal law.

Responsibilities

The executive management team will possess final approval authority over Advessa's compensation system.

1. On an annual basis the executive management team will review and approve, as appropriate, recommended changes to position-range movement as determined through the vendor's market analysis process.
2. As part of the annual budgeting process, the executive management team will review and approve, as appropriate, funds to be allocated for total compensation, which would include base salaries, bonus, variable based or incentive-based pay, and all other related expenses, including benefit plans.

Management Responsibility

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1. The CEO, Jessica Pelletier, is charged with ensuring that Advesa is staffed with highly-qualified, fully competent employees and that all company programs are administered within appropriate guidelines and within the approved budget.
2. The salary budget will include a gross figure for the following budget adjustments, but the individual determinations for each employee's salary adjustment will be the exclusive domain of the CEO: determining the appropriate head count, titles, position levels, merit and promotional increases and compensation consisting of salary, incentive, bonus, and other discretionary pay for all positions.
3. The CEO will ensure that salary ranges are updated at least annually, that all individual jobs are market priced at least once every two years, and that pay equity adjustments are administered in a fair and equitable manner.



Record Keeping Procedures

Advesa has established policies regarding record keeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Advesa intends to maintain all records, to the extent feasible, in electronic form. If physical records are used, they will be stored at Advesa's Cambridge marijuana retailer establishment in a locked room designated for record retention. All written and electronic records will be available for inspection by the CCC upon request in accordance with 935 CMR 500.300(1).

Record Keeping Procedures

All records will be maintained in accordance with Generally-Accepted Accounting Principles ("GAAP"). In order to ensure that Advesa's record keeping practices remain compliant with the specific requirements of 935 CMR 500.030, executive management team review of Corporate Records, Business Records, and Personnel Records for completeness, accuracy, and timeliness of such documents will occur as part of Advesa's quarter-end closing procedures. Advesa will meet CCC record keeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations and herein below. In addition, Advesa will update its internal operating procedures on regular basis, as needed and under the supervision of the executive management team in order to ensure the safe and compliant keeping of records. Advesa's internal operating procedures will provide for the safe and compliant keeping and maintenance of the following critical enterprise records:

- A. **Corporate Records:** are defined as those records that require, at a minimum, annual reviews, updates, and renewals. These records include:
1. Insurance Coverage Records (including: Directors & Officers Policies, Product Liability Policies; General Liability Policies, Umbrella Policies, Workers Compensation Policies and Employer Professional Liability Policies);
 2. Third-Party Contracts;
 3. CCC Required Registrations (including: Annual Agent Registration(s) and Annual Marijuana Establishment Registration);
 4. Local Compliance Documents (including: Certificate of Occupancy, Special Permits, Variances, Site Plan Approvals and As-Built Drawings);
and
 5. Corporate Governance Filings (including: Annual Reports and Secretary of State Filings).
 6. Waste records will be kept for a minimum of three years as required by 935 CMR 500.105(12).
 7. Written operating procedures shall be maintained as required by 935 CMR 500.105(1) and 935 CMR 500.105(9).
 8. Inventory records as required by 935 CMR 500.105(8) and 500.105(9).



9. Seed to Sale tracking records for all marijuana required by 935 CMR 500.105(8) and 935 CMR 500.105(9).

B. Business Records: as are required by 935 CMR 500.105(9) Advesa will keep these records in electronic form, if possible, so that Advesa can efficiently produce the records for inspection by the CCC.

The following business records will be maintained:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts;
- Sales records; and
- Salary and wages paid to each employee. *935 CMR 500.105(9)*

C. Personnel Records: as are required by 935 CMR 500.105(9) Advesa will keep these records in electronic form, if possible, so that Advesa can efficiently produce the records for inspection by the CCC.

- Job descriptions for each agent;
- A personnel record for each agent.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030 and 935 CMR 500.105(9)

Plan for Maintaining Financial Records

Advesa's operating policies and procedures and comprehensive record keeping procedures (see Advesa's companion Record Keeping Procedures for greater detail) will ensure that its financial records are accurate and maintained in compliance with the CCC's regulations at 935 CMR 500 *et. seq.* Advesa's financial records maintenance plan includes policies and procedures requiring that:

- A. Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.
- B. All record keeping requirements under 935 CMR 500.105(9) will be followed, including the keeping written business records available for inspection, and in accordance with Generally Accepted Accounting Principles, which will include manual or, if possible, electronic records of: 1) statements assets and liabilities; 2) monetary transactions; 3) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; 4) sales records including quantity, form and cost of marijuana products; and 5) salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
- C. Additional written business records will be kept, including, but not limited to, records of: 1) compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); 2) fees paid under 935 CMR 500.005 or any other section of the CCC's regulations; and 3) fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the CCC's regulations.
- D. Advesa will never utilize software or other methods to manipulate or alter sales data as per 935 CMR 500.140(6) on marijuana retailers. Advesa will conduct a monthly analysis of equipment determine that no software has been installed that could be utilized to manipulate or alter sales data. We will maintain records that we have performed the monthly analysis. If we determine that software or other methods have been installed/utilized to manipulate or alter sales data: we shall immediately disclose the information to the Commission, cooperate in any investigation, and take such other action directed by the Commission as per regulation 935 CMR 500.140.



- E. Advesa will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements as per *935 CMR 500.140(6)*. We will also adopt separate accounting practices at the point-of-sale for marijuana and non-marijuana sales.



Diversity Plan

Advesa is committed to developing and maintaining an atmosphere of inclusivity and tolerance at its Cambridge marijuana retailer establishment and hiring a diverse workforce that is made up of minorities, women, veterans, people with disabilities, and people identifying as LGBTQ+. In addition, Advesa will make every effort to employ and advance in employment qualified and diverse people at all levels within the company. Our diversity 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. We acknowledge that the progress and success of our diversity plan must be documented upon renewal of our license and each year hereafter. Our diversity plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Executive Director

Advesa's hiring efforts will be led by cannabis activist and entrepreneur Shanel Lindsay, who will join Advesa as Executive Director and have the additional charge of setting Advesa's hiring goals and community outreach plans. Lindsay will lead a hiring campaign that combines high technology – including geo-targeted online advertisements for job postings – and local engagement, working with community partners to reach the diverse groups necessary to comply with our Diversity Plan goals.

Goals

Advesa will assemble a diverse and representative workforce, drawn from Cambridge and surrounding communities, and that will maintain a diverse, aware, and inclusive working environment through its hiring practices, employee retention and advancement policies, and new employee training. Advesa will measure the success of its diversity-supporting program through our goals, metrics, and success of the program, as discussed below.

- Hire 25 employees
- Hire 51% of employees that are women, minorities, veterans, people with disabilities, and people identifying as LGBTQ+.
- Hire 51% of management staff that are women, minorities, veterans, people with disabilities, or people identifying as LGBTQ+
- Hire 30% women
- Hire 30% minorities



- Hire 10% veterans
- Hire 10% LGBTQ+
- Hire 5% persons with disabilities
- Host/Attend job fairs once per quarter

Programs

Advesa's Diversity Outreach Initiative

- Advesa's Executive Director will identify community partners in Cambridge and nearby communities, that can assist Advesa in identifying women, minority, veteran, disabled, and LGBTQ+ residents of Cambridge and nearby communities to fill open positions within the company. Either independently, or in partnership with its community partner(s).
- Advesa will place emphasis on hiring from job fairs located at Bunker Hill Community College in Boston, North Shore Community College in Lynn in order to identify and recruit from diverse groups individuals that have an interest making careers in the adult-use cannabis industry.
- Advesa will utilize geo-targeting features of Google Adsense to target ads towards Cambridge and nearby diverse community residents with at least one job posting per quarter stating that Advesa is specifically looking for women, minorities, or persons with disabilities to work for the establishment.
- Advesa will work with Cambridge's Office of Community Development to identify additional community organizations with which Advesa could partner and keep abreast of workforce development challenges.
- The Executive Director will compile this information into an annual report that will be completed within 180 days of commence operations and annually thereafter for both internal and CCC review.

Advesa's Job Fair Diversity Assessment Program

- Advesa's Executive Director will assess language barriers to entry for both job applicants and persons expressing interest in employment opportunities during community job fairs once a quarter following each quarterly job fair.



- Advesa's Executive Director will set goals for hiring at each job fair and at the end of the job fair see whether or not the venue brought the diverse candidates necessary to comply with the Diversity Plan.
- Advesa's Executive Director will write a detailed report measuring the goals and outcomes of each job fair at the end of each quarter. Based on this report, changes may be made to further the diversity plans goals if necessary. These job fair reports will be included in the Quarterly Diversity Census Reports to help with the diversity assessment.

Measurements

Advesa's Quarterly Diversity Census Reports

1. Advesa's Executive Director will count every quarter the number of individuals hired who are minorities, women, veterans, and persons with disabilities and how it measures up against our plan goals.
2. Advesa's Executive Director will assess the total number of qualifying diverse individuals hired who are hired in a given quarter to ensure that our 75% goals are being met.
3. Advesa's Executive Director will assess whether our job outreach posting on using Google Adsense and whether it needs to be improved or changed to increase diverse hires.
4. Advesa's Executive Director will assess whether job fairs need to be held/attended more frequently than once a quarter in order to make diverse hires.
5. Advesa's Executive Director will hire at least 5 employees that qualify under our diversity plan in a given quarter to measure and ensure our goals to hire a minimum of 20 employees are met by the end of the 12 month period.
6. Advesa's Executive Director will also assess whether the management of the company is representative of our diversity goals.
7. The quarterly internal census report shall also include detailed information about any harassment or discrimination complaints that arose during the preceding quarter, and the steps that the company took to investigate, resolve and remedy all such complaints.
8. The report will also detail whether any Departments in the company are lacking in diversity or having difficulty making diverse hires.



9. Actions taken the following quarter for the Diversity Plan will originate from these quarterly internal census reviews.

10. Quarterly reviews will be assessed annually with progress reports in the Diversity Outreach Initiative Report produced by the Executive Director.

Advesa's State of Diversity Report

Advesa's Executive Director will once a year produce a State of Diversity Report that will measure the success of our Diversity Programs annually. This report will be timed to coincide with our annual license renewal with the Cannabis Control Commission and will incorporate the Diversity Outreach Initiative annualized report as part of its contents.

It will include the following:

- All Quarterly Diversity Census Reports
- The Diversity Outreach Initiative Report
- Job Fair Assessment Reports

It will ask the following questions:

- Did Advesa achieve its diversity goal of 75% women, minorities, veterans, people with disabilities, and people identifying as LGBTQ+?
- Did Advesa hire 75% of management staff that are women, minorities, veterans, people with disabilities, or people identifying as LGBTQ+?
- Did Advesa achieve its diversity goals of hiring 40% women, 40% minorities, 10% veterans, 10% LGBTQ+, and 5% people with disabilities?
- Did Advesa host or attend at least one job fair per quarter and what and where were those job fairs?
- Was any population segment of our diversity goals underrepresented in any kind of position including management?
- What can be improved upon in order to improve outcomes for our employees?
- Is it possible to increase our Diversity goals for the next year?
- Are there any populations of diverse people that can have their percentages increased in our diversity goals for the next year?
- Can we increase the amount of job fairs we hold/attend in the next year?



Diversity Plan Acknowledgments

Advesa pledges to adhere to the requirements set forth in 935 CMR 500.105(4)(a) which provides the permitted advertising, branding, marketing and sponsorship practices for all Marijuana Establishments. Advesa likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted by Advesa will violate the CCC's regulations with respect to limitations on ownership or control or any other applicable state laws. All records required by the Diversity Plan will be retained on the premises of Advesa's facility for a period of at least 10 years.



Qualifications and Training

All employees hired to work at Advesa will be qualified and licensed as marijuana establishment agents and additionally will be set up to succeed in their respective roles in a manner that ensures Advesa complies with all regulatory requirements.

All Advesa marijuana establishment agents will be 21 years of age or older in compliance with 935 CMR 500.030. Similarly, no marijuana establishment agent will be hired who has been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Additionally, all Advesa marijuana establishment agents will meet the requirements of 935 CMR 500.802. In the event that Advesa discovers any of its agents has become unsuitable for licensure as marijuana establishment agents, Advesa will terminate the agent's employment and notify the CCC within 1 business day that the agent is no longer associated with the establishment.

Pursuant to 935 CMR 500.105(2), and before performing any regulated job activities, each of Advesa's marijuana establishment agents will complete an Advesa-specific training program customized for the roles and responsibilities of the agent's job function. This agent training will, at minimum, include the Responsible Vendor Program to be established by the CCC and at least eight (8) hours of on-going training annually.

Prior to commencement of operations, all of Advesa's current owners, managers, and employees – regardless of function – will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the CCC to provide the annually required responsible vendor training to marijuana establishment agents. All new, non-administrative employees will complete the Responsible Vendor Program within 90 days of employment. As required, all owners, managers, and employees will subsequently complete the continuing vendor responsibility program courses once every year thereafter.

Records of responsible vendor training program compliance will be maintained for at least four (4) years per CCC regulations.

As part of Advesa's overall training, marijuana establishment agents will receive training on a variety of topics, including but not limited to the following:

1. Marijuana's physical effect on the human body, including variations in different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;

2. Best practices for diversion prevention and prevention of sales to minors and full training on the components of Advesa's Diversion Prevention Plan;
3. Compliance with seed-to-sale tracking, storage and inventory management requirements;
4. Training on secondary identification checks, including acceptable forms of identification and recognizing fraudulent documents;
5. All other areas of Responsible Vendor training as determined by the CCC; and
6. Other significant state laws and rules affecting operators, such as:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability and license sanctions and court sanctions;
 - Waste disposal and health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale and conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records and privacy issues; and
 - Prohibited purchases and practices.

Energy Compliance Plan

Advesa MA, Inc. (“Advesa”) will operate according to 935 CMR 500.105(1)(q) to ensure maximum energy efficiency and equipment standards are implemented and utilized so that we comply with the existing rules and regulations around energy efficiency and conservation. The Executive Director of Advesa will have the responsibility of reporting ongoing energy compliance updates to management and designating employees who will focus on identifying potential energy reduction opportunities.

Advesa will comply with 935 CMR 500.105(1)(q) by doing the following:

1. Advesa will always utilize natural lighting whenever possible to minimize use of electricity.
2. Advesa’s front vestibule areas in Cambridge will utilize natural light whenever possible.
3. All lights in non-customer areas will be on sensors to shut off when not in use.
4. Advesa will engage an energy saving consultant once a calendar year to point out potential energy reduction opportunities such as heat recovery and ventilation efficiency as well as how to implement those changes.
5. The energy consultant will also review our operations to find out if anything we currently are doing could be more efficient or if any energy generation opportunities are present.
6. We are committed to working with the Dark Sky’s initiative and limiting outdoor night time light pollution to only what is required to comply with Commission regulations.
7. Our smart lighting will adjust to the time of day and automatically turn off when not being utilized.
8. Advesa is also committed to work with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants and working with the City of Cambridge to ensure our participation in those programs.
9. Upon quarterly review of energy and water usage, note will be taken of any previous goals and whether those goals had been met to increase efficiency and exceed regulatory requirements.