



Massachusetts Cannabis Control Commission

Marijuana Microbusiness

General Information:

License Number: MB282528
Original Issued Date: 02/13/2026
Issued Date: 02/13/2026
Expiration Date: 02/13/2027

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Chispa Tres LLC

Phone Number: 203-550-9589
Email Address: gacostarua@pegasusdl.com

Business Address 1: 70 Ellsworth Street	Business Address 2: Suite 1	
Business City: Worcester	Business State: MA	Business Zip Code: 01610
Mailing Address 1: 90 Ellsworth Street	Mailing Address 2: Suite 1	
Mailing City: Worcester	Mailing State: MA	Mailing Zip Code: 01610

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business, Woman-Owned Business

PRIORITY APPLICANT

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

RMD INFORMATION

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

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role:	
First Name: Kaneez	Last Name: Henry	Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian), Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership:

Percentage Of Control:

Role: Manager

Other Role:

First Name: Gaston

Last Name: Acosta- Rúa Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: G&S Management Services LLC

Entity DBA:

DBA City:

Entity Description: License company

Foreign Subsidiary Narrative:

Entity Phone: 203-550-9589

Entity Email: gacostarua@pegasusdlt.com

Entity Website:

Entity Address 1: 90 Ellsworth Street

Entity Address 2: Suite 3

Entity City: Worcester

Entity State: MA

Entity Zip Code: 01610

Entity Mailing Address 1: 90 Ellsworth Street

Entity Mailing Address 2: Suite 1

Entity Mailing City: Worcester

Entity Mailing State: MA

Entity Mailing Zip Code: 01610

Relationship Description: G&S Management Services LLC is a microbusiness license applicant company [Application Number: MBN282519] that is 100% owned by Kaneez Henry. G&S Management Services LLC is the sole owner of Chispa Tres LLC. Technically it is G&S Management Services LLC that has 100% ownership and 100% control. K Henry has 100% ownership and 100% control of G&S Management Services LLC.

Entity with Direct or Indirect Authority 2

Percentage of Control:

Percentage of Ownership:

Entity Legal Name: PegasusCPT LLC

Entity DBA:

DBA City:

Entity Description: PegasusCPT

Foreign Subsidiary Narrative:

Entity Phone: 203-550-9589

Entity Email: gacostarua@pegasusdlt.com

Entity Website:

Entity Address 1: 196 Danbury Road

Entity Address 2: Suite 202E

Entity City: Wilton

Entity State: CT

Entity Zip Code: 06897

Entity Mailing Address 1: 196 Danbury Road

Entity Mailing Address 2: Suite 202E

Entity Mailing City: Wilton

Entity Mailing State: CT

Entity Mailing Zip Code: 06897

Relationship Description: PegasusCPT LLC will provide intellectual property, expertise, and know how to Chispa Tres LLC for cultivation and product manufacturing. Additionally PegasusCPT LLC will provide financing to the venture for capital investment and start up costs and expenses. PegasusCPT LLC is a signatory and guarantor on the lease along with Chispa Tres LLC.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Gaston **Last Name:** Acosta-Rua **Suffix:**

Describe the nature of the relationship this person has with the Marijuana Establishment: Owner of PegasusCPT LLC

PegasusCPT LLC will provide financing
PegasusCPT LLC will provide technical expertise
PegasusCPT LLC will provide operational support
PegasusCPT LLC will provide management and back office services
PegasusCPT LLC is cosignor and guarantor under the lease

Close Associates or Member 2

First Name: Kaneez **Last Name:** Henry **Suffix:**

Describe the nature of the relationship this person has with the Marijuana Establishment: K Henry is the sole owner of G&S Management Services LLC

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: PegasusCPT LLC **Entity DBA:**

Email: gacostarua@pegasusdlt.com **Phone:** 203-550-9589

Address 1: 196 Danbury Road **Address 2:** Suite 202E

City: Wilton **State:** CT **Zip Code:** 06897

Types of Capital: Debt, Monetary/
Equity **Other Type of Capital:** **Total Value of Capital Provided:** \$150000 **Percentage of Initial Capital:** 97

Capital Attestation: Yes

Entity Contributing Capital 2

Entity Legal Name: G&S Management Services LLC **Entity DBA:**

Email: gacostarua@pegasusdlt.com **Phone:** 413-896-1912

Address 1: 90 Ellsworth Street **Address 2:** Suite 3

City: Worcester **State:** MA **Zip Code:** 01610

Types of Capital: Monetary/Equity, Debt **Other Type of Capital:** **Total Value of Capital Provided:** \$5000 **Percentage of Initial Capital:** 3

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Kaneez **Last Name:** Henry **Suffix:**

Marijuana Establishment Name: G&S Management Services LLC **Business Type:** Marijuana Microbusiness

Marijuana Establishment City: Worcester **Marijuana Establishment State:** MA

Individual 2

Date generated: 03/17/2026

Role: Manager **Other Role:**
First Name: Gaston **Last Name:** Acosta-Rua **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Executive / Officer **Other Role:**
First Name: Kaneez **Last Name:** Henry **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: G&S Management Services LLC **Entity DBA:**
Entity Description: Parent Company and Microbusiness Licensee Applicant
Phone: 203-550-9589 **Email:** k@thcxr.com
Primary Business Address 1: 90 Ellsworth Street **Primary Business Address 2:** Suite 3
Primary Business City: Worcester **Primary Business State:** MA **Principal Business Zip Code:** 01610

Additional Information: G&S Management Services LLC is the sole owner of Chispa Tres LLC. G&S Management Services LLC is applying for its own microbusiness license as a product manufacturer to produce cannabis infused gummies [Application Number: MBN282519]. G&S Management Services LLC has entered into a lease and will operate at 90 Ellsworth Street Suite 3. Chispa Tres LLC has entered into a lease and will operate at 90 Ellsworth Street in Worcester MA Suite 1. Both companies will be run as separate independant business entities with their own licenses and their own staff.

Entity Background Check Information 2

Role: Investor/Contributor **Other Role:**
Entity Legal Name: PegasusCPT LLC **Entity DBA:**
Entity Description: PegasusCPT LLC - contributing technology, operational expertise, project management, and financing
Phone: 203-550-9589 **Email:** gacostarua@pegasusdlc.com
Primary Business Address 1: 196 Danbury Road **Primary Business Address 2:** Suite 202E
Primary Business City: Wilton **Primary Business State:** CT **Principal Business Zip Code:** 06897

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	LLC Articles OR Certificate of Organization.pdf	pdf	67d6e768541e85345e2c1b00	03/16/2025
DUA attestation if no employees	ATTESTATION FORM - NO EMPLOYEES.pdf	pdf	67d6e7cddc92c5a698fe1685	03/16/2025
Department of Unemployment Assistance - Certificate of Good standing	Unregistered Employer Certificate of Compliance - DUA.pdf	pdf	67d6f18adc92c5a698fe1a9d	03/16/2025

Bylaws	CHISPA TRES LLC_OPERATING AGREEMENT.pdf	pdf	6804f9546db75c557460d6ee	04/20/2025
Department of Revenue - Certificate of Good standing	Certificate of Good Standing C3 - DOR.pdf	pdf	680628d92c28cf28695d9f	04/21/2025
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing - Chispa Tres LLC.pdf	pdf	680629b82c28cf28695e56	04/21/2025

No documents uploaded

Massachusetts Business Identification Number: 001857767

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	C3 - Summary Management and Operations Plan_2172025.pdf	pdf	67d6f2b9541e85345e2c1de9	03/16/2025
Operating Agreement or Articles of Incorporation	LLC Articles OR Certificate of Organization.pdf	pdf	67d6f427541e85345e2c2142	03/16/2025
Plan for Liability Insurance	C3 - Liability Insurance Plan_04212025.pdf	pdf	680623e86db75c55746112b3	04/21/2025
Capitalization Table	Chispa Tres LLC - Cap Table_04212025.pdf	pdf	680626026db75c5574611300	04/21/2025
Operating Agreement or Articles of Incorporation	CHISPA TRES LLC_OPERATING AGREEMENT.pdf	pdf	6806264f6db75c557461131a	04/21/2025
Proposed Timeline	C3 - Proposed Timeline for Cannabis Microbusiness Operations_09292025.pdf	pdf	68dd8402366765b777b823b4	10/01/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Separating recreational from medical operations, if applicable	19.5 - Separating Recreational from Medical Operations.pdf	pdf	67d80b11556d4ed6fdad3180	03/17/2025
Prevention of diversion	19.8 - Prevention of Diversion Plan.pdf	pdf	67d80b32556d4ed6fdad31c2	03/17/2025
Storage of marijuana	19.9 - Storage of Marijuana Policy and Proceedures.pdf	pdf	67d80b4b556d4ed6fdad31d6	03/17/2025
Dispensing procedures	19.13 - Dispensing Policies and Proceedures.pdf	pdf	67d80b77556d4ed6fdad322c	03/17/2025
Record Keeping procedures	19.15 - Record Keeping Policies and Proceedures - C3.pdf	pdf	67d80b8e556d4ed6fdad3254	03/17/2025
Maintaining of financial records	19.16 - Policy for Maintaining of Financial Records.pdf	pdf	67d80b9f556d4ed6fdad326e	03/17/2025
Safety Plan for Manufacturing	19.20 - Safety Plan for Cannabis Product	pdf	67d80bca556d4ed6fdad32be	03/17/2025

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 - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

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: 10:00 AM	Saturday To: 5:00 PM
Sunday From: 10:00 AM	Sunday To: 5:00 PM

Chispa Tres LLC

Plan to Remain Compliant with Local Permits and Zoning

3.15.2025

Chispa Tres LLC ("the Company") proposes to operate a Cannabis Microbusiness as a small batch cultivator and product manufacturer of solventless bubble hash and rosin, at 90 Ellsworth Street Suite 1, Worcester, MA ("the Premises"). The Company is committed to full compliance with all local permits and zoning requirements for the City of Worcester.

Special Permit

The Company is currently in the process of obtaining a Special Permit from the Worcester Planning Board to operate as a Marijuana Establishment, as required by the Worcester Zoning Ordinances. We will fully adhere to all terms and conditions of the Special Permit once obtained.

Zoning Compliance

1. The Company will ensure that the Premises is located in a zoning district that permits Marijuana Establishments, as determined by Table 4.1 of the Worcester Zoning Ordinance.
2. We will comply with all dimensional requirements specified in the Zoning Ordinance for Marijuana Establishments.
3. The Company will adhere to the 500-foot buffer zone requirement, ensuring that our facility is not located within 500 feet of a school.

Odor Control

The Company will implement and maintain an odor control plan that includes:

1. Proper ventilation systems to prevent the dispersion of odors in the manufacturing process.
2. Regular maintenance of all odor control equipment.
3. Documentation of specific odor-emitting activities, their sources, frequency, and duration.
4. See Chispa Tres LLC – Odor Mitigation Plan

Security Plan

We will develop and implement a comprehensive security plan that includes:

1. Monitoring systems to prevent illegal activities on the premises.
2. Installation of adequate lighting, gates, and fencing as needed.
3. See Chispa Tres LLC - Security Policy

Ongoing Compliance Measures

1. Regular review and updates of our compliance procedures to align with any changes in local regulations.
2. Maintenance of all required licenses and permits, ensuring timely renewals.
3. Ongoing training for staff on compliance requirements and best practices.
4. Regular communication with local authorities to stay informed of any regulatory changes.

Community Engagement

The Company will:

1. Conduct the required community outreach meeting as per CCC guidelines.
2. Maintain open lines of communication with city officials, neighbors, and the public.
3. Respond promptly to any community concerns that may arise.

THANK YOU for your submission!

Your notice has been submitted for publication. Below is a confirmation of your order. You will also receive an email confirmation.

ORDER DETAILS

Order Number:
LNEO0285092
External Order #:
11255457
Order Status:
Changed
Classification:
Public Notices
Package:
General Package
Base amount:
52.20
Service fee:
2.08
Cash/Check/ACH

Discount:
-0.00

Total payment:
54.28

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save! In no event are service fees refundable.

Payment Type:
amex

User ID:
L0103750

PREVIEW FOR AD NUMBER LNEO02850920

Community Outreach Public Notice

Notice is hereby given that Chispa Tres LLC. will hold a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday May 12, 2025 at 5:30PM at 90 Ellsworth Street. The proposed Cultivation and Product Manufacturing Microbusiness is anticipated to be located at 90 Ellsworth Steet Suite 1, Worcester MA. There will be an opportunity for the public to ask questions.

April 26 2025
LNEO0285092

[<< Click here to print a printer friendly version >>](#)

ACCOUNT INFORMATION

Gaston Acosta-Rua
196 Danbury Road Suite 202E
Wilton, CT 06897
203-550-9589
gacostarua@pegasusdl.com
PegasusCPT LLC
Contract ID:

PAYMENT DETAILS

amex*****9006

TRANSACTION REPORT

Date

April 23, 2025 2:43:28 PM EDT

Amount:

54.28

ADDITIONAL OPTIONS

1 Affidavit

SCHEDULE FOR AD NUMBER LNEO02850920

April 26, 2025

Worcester Telegram & Gazette

[Privacy Policy](#)

| [Terms of Service](#)

[Contact Us](#)

i-Publish® AdPortal: v2.6

©2025 iPublish Media Solutions, LLC

**NOTICE OF COMMUNITY OUTREACH MEETING
FOR PROPOSED MARIJUANA RETAILER**

April 23, 2025

To Whom It May Concern:

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

Date and Time: Monday, May 12, 2025 at 5:30PM

Location: 90 Ellsworth Street, Worcester, MA 01610

The proposed Cultivation and Product Manufacturing Microbusiness is anticipated to be located at the same address, 90 Ellsworth Street Suite 1. There will be an opportunity for the public to ask questions.

Sincerely, on behalf of Chispa Tres LLC,

Gaston Acosta-Rua

Authorized Agent

90 Ellsworth Street Suite 1

Worcester MA 01610

203.550.9589

gacostarua@pegasusdlt.com

Community Outreach Public Notice

Notice is hereby given that Chispa Tres LLC. will hold a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday May 12, 2025 at 5:30PM at 90 Ellsworth Street. The proposed Cultivation and Product Manufacturing Microbusiness is anticipated to be located at 90 Ellsworth Steet Suite 1, Worcester MA. There will be an opportunity for the public to ask questions.

RECEIVED
WORCESTER OFFICE
2025 APR 24 AM 9:07



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



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

a. Date of publication:

b. Name of publication: *Telegram & Gazette*

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:

Chispa Tres LLC

Name of applicant's authorized representative:

Gaston Acosta-Rua

Signature of applicant's authorized representative:

Gaston Acosta-Rua

Digitally signed by Gaston Acosta-Rua
Date: 2025.04.24 11:19:47 -04'00'

'25 JAN 23 PM 12:03

CITY OF WORCESTER, MASSACHUSETTS

Edward M. Augustus, Jr.
City Manager



Samuel Konieczny, MAA
City Assessor

Administration and Finance
Division of Assessing

REQUEST FOR MAPS AND/OR ABUTTERS' LISTS:

Please be advised that requested lists will typically be completed within ten (10) business days. Lists will be provided for a fee of \$20.00 paid at the time of request. Please state the reason for the abutters' list and indicate if the subject parcel has shared ownership with an adjoining parcel, this will ensure the provided list meets the appropriate regulations. Two sets of mailing labels will be included when required.

Our email address is: Assessing@worcesterma.gov and our fax number is (508) 799-1021.

Please contact our office with any questions.

ABUTTER'S LIST LABELS Yes No 1 SET 2 SETS
 MAP(S)

PROPERTY ADDRESS 90 Ellsworth Street

Worcester, MA

MBL No. 05-040-00076

REASON: PLANNING
 ZONING
 LIQUOR LICENSE
 CONSERVATION COMMISSION
 HISTORICAL COMMISSION
 OTHER

Footage for radius 300

CONTACT: NAME: Stephanie Fleming
 ADDRESS: 311 Main Street, Worcester
 TELEPHONE: MA, 01608, 508-926-3346

*Mail to
sfleming@worcesterma.com*



Eric D. Batista
CITY MANAGER



CITY OF WORCESTER
ADMINISTRATION & FINANCE

Timothy J. McGourthy
CHIEF FINANCIAL OFFICER

Samuel E. Konieczny
CITY ASSESSOR

Certified Abutters List

A list of 'parties in interest' shall be attached to the application form and shall include the names and addresses. All such names and addresses shall be obtained from the most recent applicable tax list maintained by the City's Assessing Department. The Assessing Department certifies the list of names and addresses.

Total Count: 14

Parcel Address: 90 ELLSWORTH ST
WORCESTER, MA 01610

Assessor's Map-Block-Lot(s): 05-040-00076

Owner: BARARO REALTY COMPANY LLC
Mailing Address: 9 WINTER ST
WORCESTER, MA 01604

Petitioner (if other than owner): STEPHANIE FLEMING
311 MAIN STREET
WORCESTER, MA 01608
508-926-3346

Planning: Zoning: _____ Liquor License: _____ Conn. Comm.: _____
Historical: _____ Cannabis: _____ Other: _____



05-013-00001	0131 LAMARTINE ST	WORCESTER, MA 01608
05-012-00005	0300 WEST MAIN ST, BUILDING A UNIT 1	NORTHBOROUGH, MA 01532
05-040-00064	PO BOX 270	HARTFORD, MA 06141-0270
05-012-0013A	0512 GREENVILLE AVENUE, P.O. BOX 2246	STAUNTON, VA 24402
05-012-16-21	306 MAIN ST	WORCESTER,, MA 01608
05-013-00412	0080 HERMON STREET	WORCESTER, MA 01610
05-013-00002	0056 WILDWOOD AVE	WORCESTER, MA 01603
05-040-00007	0060 ELLSWORTH ST	WORCESTER, MA 01608
05-040-00008	PO BOX 55	WORCESTER, MA 01613-0055
05-040-00076	0009 WINTER ST	WORCESTER, MA 01604
05-040-00001	PO BOX 270	HARTFORD, CT 06141-0270
05-040-22+47	PO BOX 270	HARTFORD, MA 06141-0270
05-022-0102A	PO BOX 270	HARTFORD, CT 06141-0270
05-022-01+02	PO BOX 270	HARTFORD, CT 06141

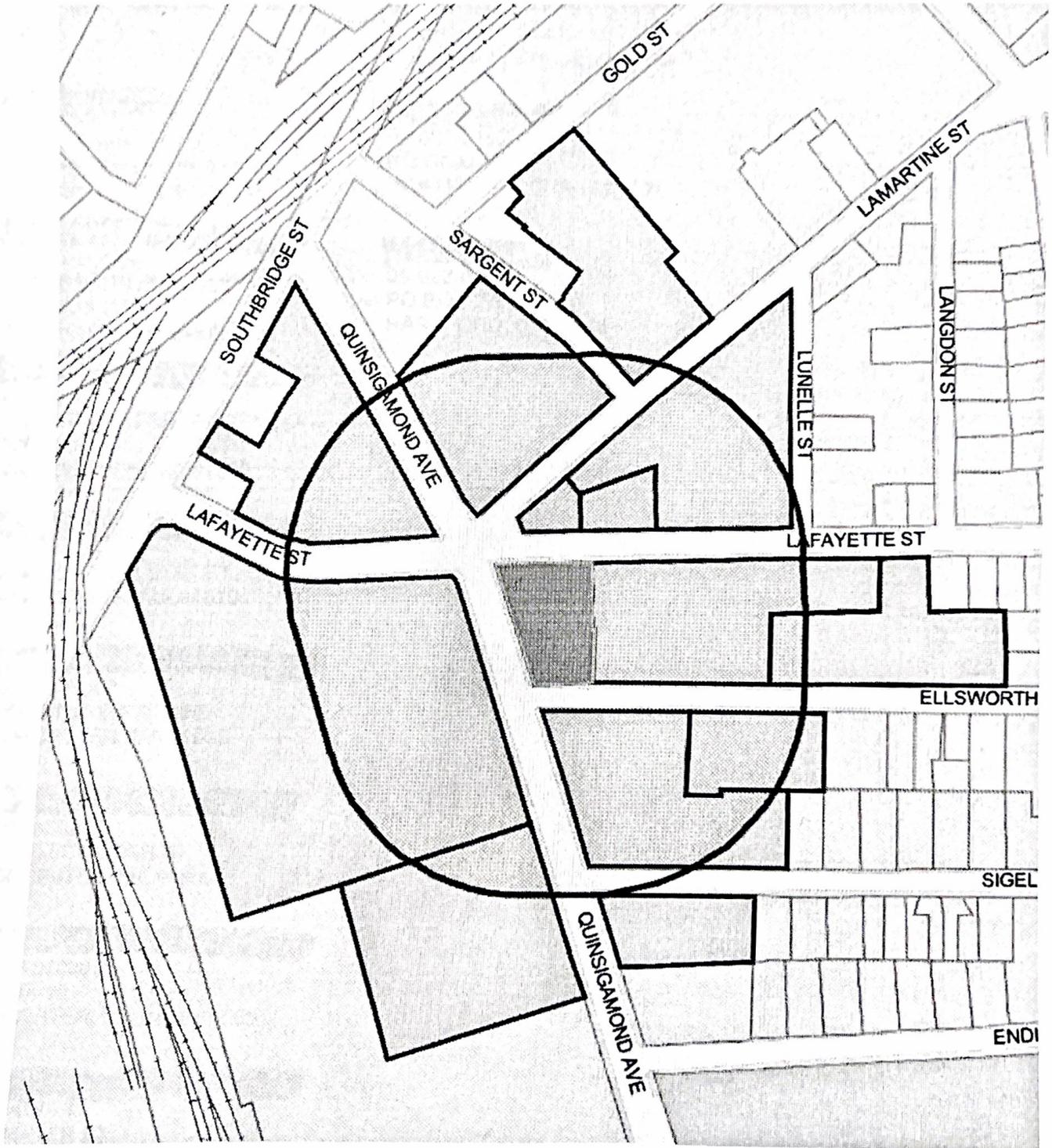
This is to certify that the above is a list of abutters to Assessor's Map-Block-Lot(s) **05-040-00076** as cited above.
Certified by:

Signature

Date: JAN. 24, 2025



Abutters Map



[REDACTED]
05-013-00001
0131 LAMARTINE ST
WORCESTER, MA 01608

[REDACTED]
05-040-00001
PO BOX 270
PROPERTY TAX DEPT
HARTFORD, CT 06141-0270

[REDACTED]
05-012-00005
0300 WEST MAIN ST
BUILDING A UNIT 1
NORTHBOROUGH, MA 01532

[REDACTED]
05-040-22+47
PO BOX 270
PROPERTY TAX DEPT
HARTFORD, MA 06141-0270

[REDACTED]
05-040-00064
PO BOX 270
PROPERTY TAX DEPT
HARTFORD, MA 06141-0270

[REDACTED]
05-022-0102A
PO BOX 270
HARTFORD, CT 06141-0270

[REDACTED]
05-012-0013A
0512 GREENVILLE AVENUE
P O. BOX 2246
STAUNTON, VA 24402

[REDACTED]
05-022-01+02
PO BOX 270
HARTFORD, CT 06141

[REDACTED]
05-012-16-21
C/O GREENBERG, ROSENBLAT...
306 MAIN ST
WORCESTER,, MA 01608

[REDACTED]
05-013-00412
0080 HERMON STREET
WORCESTER, MA 01610

[REDACTED]
05-013-00002
0056 WILDWOOD AVE
WORCESTER, MA 01603

[REDACTED]
05-040-00007
0060 ELLSWORTH ST
WORCESTER, MA 01608

[REDACTED]
05-040-00008
PO BOX 55
WORCESTER, MA 01613-0055

[REDACTED]
05-040-00076
0009 WINTER ST
WORCESTER, MA 01604

Positive Impact Plan for Chispa Tres LLC

11.05.2025

Target Population and Geographic Area:

Chispa Tres LLC's business address has a Census Tract Number of 732500, which is not in a Disproportionately Impact Area, however some surrounding residential neighborhoods are.

Our Positive Impact Plan will focus on benefiting residents of Worcester, MA, which has been identified as an area of disproportionate impact by the Cannabis Control Commission. We will particularly target residents of economically disadvantaged neighborhoods within Worcester including residents currently living in Census Tracts (730200, 730500, 731002, 731203, 731204, 731300, 731400, 731500, 731700, 731800, 732001, 732302, 732400, 732700, 733000).

Goal 1: Employment Opportunities for Disproportionately Impacted Individuals

Objective:

Hire at least one of the three total employees (33%) from populations disproportionately impacted by marijuana prohibition, including residents of designated census tracts in Worcester, individuals with past drug convictions, or family members of individuals with past convictions.

Recruitment Plan:

- Job openings will be advertised through Worcester workforce boards, community organizations, and local job resources targeting disproportionately impacted neighborhoods and individuals.
- Outreach efforts include flyers, social media announcements, and engagement with organizations such as the Worcester Jobs Fund and reentry programs.
- Applications will specifically invite candidates from disproportionately impacted groups, with priority given to qualified applicants from these populations.

Metrics:

- Track the number and percentage of employees hired from disproportionately impacted populations each year.
- Document recruitment sources, outreach activities, and demographics of applicants.
- Provide an annual report to the Cannabis Control Commission detailing hiring outcomes and steps taken.

Goal 2: Mentorship and Entrepreneur Training Program

Objective:

Provide a structured mentorship and entrepreneur training program targeted at aspiring cannabis business owners from disproportionately impacted populations in Worcester.

Program Structure:

- Conduct one annual 3-month mentorship cohort, with one participant selected from local candidates.
- The program curriculum will cover cannabis business basics, regulatory compliance, product manufacturing, and entrepreneurship.
- Mentorship pairs experienced cannabis professionals with mentees from impacted communities for guidance and skill development.
- Program will commence in the third year of operations.

Outreach and Advertising:

- Advertisements and announcements through community groups, equity alliances, NewVue Communities, NAACP Worcester branch, social media, and the Chispa Tres website.
- Flyers distributed in targeted neighborhoods and local events promoting cannabis industry equity.
- Collaboration with social equity organizations and workforce development agencies for candidate recruitment.

Metrics:

- Track number of cohorts, participants, and mentorship hours provided annually.
- Collect participant feedback and progress reports on business readiness and industry entry.
- Document advertising methods and applicant demographics.
- Provide an annual program summary report to the Cannabis Control Commission.

The Commonwealth of Massachusetts, William Francis Galvin Corporations Division

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

Certificate of Organization

(General Laws, Chapter 156C, Section 12)

Filing Fee: \$500.00

Identification Number:	001857767	(number will be assigned)
------------------------	-----------	---------------------------

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

2. The address in the Commonwealth where the records will be maintained:					
Number and street:	90 ELLSWORTH ST STE 2				
Address 2:					
City or town:	WORCESTER	State:	MA	Zip code:	01610
Country:	UNITED STATES				

3. The general character of business (if the limited liability company is organized to render professional service, this form must be filed by fax, mail or in person): CHISPA TRES LLC WILL BE PROVIDING ADMINSTRATIVE AND OPERATIONAL SERVICES TO VARIOUS OTHER COMPANIES
--

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

5. The name and address of the Resident Agent:					
Agent name:	G&S MANAGEMENT SERVICES LLC				
Number and street:	90 ELLSWORTH ST STE 1				
Address 2:					
City or town:	WORCESTER	State:	MA	Zip code:	01610

I G&S MANAGEMENT SERVICES LLC, resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.
--

01610 USA

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

Title	Name	Address

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

Title	Name	Address
REAL PROPERTY	GASTON ACOSTA-RUA	90 ELLSWORTH ST STE 2 WORCESTER, MA 01610 USA

9. Additional matters:

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

Later Effective Date (mm/dd/yyyy):

Time (HH:MM)

SIGNED UNDER THE PENALTIES OF PERJURY, this 30 Day of December, 2024,

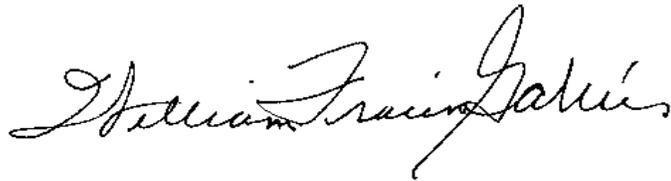
GASTON ACOSTA-RUA

, Signature of Authorized Signatory.

THE COMMONWEALTH OF MASSACHUSETTS

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

December 30, 2024 07:57 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

OPERATING AGREEMENT

1. LLC Formation and Purpose:

This Operating Agreement governs the operations of Chispa Tres LLC (the “**Company**”) a single-member Massachusetts LLC formed under Chapter 156C § 2. The LLC’s purpose is to operate as a licensed cannabis microbusiness with a cultivation and product manufacturing license under the Massachusetts Cannabis Control Commission (CCC). The Company’s business is to produce small batch single source cannabis cultivars and hash products including rosin produced from those cultivars.

2. Ownership and Management:

- a. Sole Member: G&S Management Services LLC owns 100% of the membership interest.
- b. Management Structure: The LLC is member-managed, with the sole member responsible for day-to-day operations, compliance with CCC regulations, and binding the LLC in contracts.

3. Capital Contributions:

- a. The Member’s initial contribution is \$1,000.00, documented as follows:
 - i. Cash: \$1,000.00
- b. Additional contributions require written consent of the Member.

4. Regulatory Compliance:

The LLC agrees to:

- a. Maintain compliance with 935 CMR 500.000 (CCC regulations for microbusinesses), including security plans, inventory tracking, and restricted cultivation canopy.
- b. Adhere to local zoning laws.
- c. Submit required reports to the CCC and renew the microbusiness license annually, paying applicable fees.

5. Profit, Loss, and Distributions:

- a. Allocation: Profits/losses are allocated 100% to the sole Member.
- b. Distributions: Made at the Member’s discretion, subject to maintaining sufficient reserves for regulatory obligations.

6. Tax Status:

The LLC will be taxed as a [disregarded entity/partnership/corporation] under IRS regulations. The Member is responsible for reporting income on their personal tax returns unless otherwise elected.

7. Dissolution:

The LLC may dissolve if:

- a. The Member votes to dissolve.
- b. The CCC revokes the microbusiness license.
- c. Required by state law.

Remaining assets will be distributed to the Member after settling debts and regulatory obligations.

8. Amendments:

This agreement may be amended in writing by the sole Member, provided changes comply with Massachusetts LLC law and CCC regulations.

9. Effective Date:

This agreement is effective as of December 30, 2024, the date of LLC formation.

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed as of the Effective Date by their respective officers thereunto duly authorized.

CHISPA TRES LLC

By: 

Name: Kaneez Henry

Title: Member of G&S Management Services LLC

Date: December 30, 2024



CERTIFICATE OF GOOD STANDING/TAX COMPLIANCE REQUEST STATUS



CHISPA TRES LLC
196 DANBURY RD STE 202E
WILTON CT 06897-4029

Why did I receive this notice?

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400, 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

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

Confirmation Code: jryyv5

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

February 4, 2025

TO WHOM IT MAY CONCERN:

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

CHISPA TRES LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 30, 2024.**

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

I also certify that the names of all managers listed in the most recent filing are: **GASTON ACOSTA-RUA**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **GASTON ACOSTA-RUA**

I also certify that the names of all persons authorized to act with respect to real property listed in the most recent filing are: **GASTON ACOSTA-RUA**



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

Chispa Tres LLC – Summary Management and Operations Plan

2.17.2025

1. Executive Summary

Chispa Tres LLC ("the Company") is applying for a cannabis microbusiness license in Massachusetts to engage in indoor cultivation and product manufacturing. The Company aims to produce connoisseur-grade cannabis flower and high-end solventless concentrates for the adult-use market.

2. Business Overview

Chispa Tres LLC will operate as a vertically integrated cannabis microbusiness, cultivating premium cannabis flower and manufacturing hash products and live rosin.

3. Products and Services

The Company will offer:

- Premium cannabis flower
- Hash products
- Live rosin products

4. Market Analysis

The Massachusetts adult-use cannabis market continues to grow, with consumers demonstrating demand for high-quality, craft cannabis products. There is opportunity for boutique cultivators and manufacturers focused on premium offerings.

5. Marketing Strategy

The Company will focus on building brand recognition for its connoisseur-grade products through:

- Partnerships with top dispensaries
- Cannabis industry events and trade shows
- Social media and online marketing
- Customer education on product quality and craftsmanship

6. Operations Plan

Cultivation:

- Indoor grow facility optimized for premium flower production
- Curated selection of high-quality genetics
- Rigorous quality control to ensure consistency

Manufacturing:

- Extraction lab for producing bubble hash and live rosin
- Strict adherence to safety and compliance regulations

7. Management Team

The Company is led by experienced professionals with backgrounds in:

- Cannabis cultivation and genetics
- Solventless extraction and product manufacturing
- Business operations and finance
- Regulatory compliance

8. Financial Projections

- Year 1: \$1,063,853 revenue, \$1,075,255 costs & expenses, \$(11,403) cash flow
- Year 2: \$1,914,934 revenue, \$1,248,683 costs & expenses, \$666,251 cash flow
- Year 3: \$2,925,594 revenue, \$1,364,301 costs & expenses, \$1,561,293 cash flow

9. Funding Requirements

To date the Company has invested over \$150,000 and has allocated additional funding of \$300,000 in to cover:

- Facility buildout and equipment
- Initial operating expenses
- Working capital

This Summary Management and Operations Plan outlines Chispa Tres LLC's strategy to establish itself as a premium cannabis microbusiness in Massachusetts, focusing on high-quality cultivation and manufacturing of in-demand products.

Chispa Tres LLC - Liability Insurance Plan

4.21.2025

Chispa Tres LLC insurance plan will comply 935 CMR 500.101(1) and 935 CMR 500.105(10).

1. General Liability Insurance

- a. This is the foundation of your insurance coverage, protecting against common risks:
 - i. Coverage for bodily injury and property damage
 - ii. Personal and advertising injury protection
 - iii. Medical payments coverage
 - iv. Plan will cover \$1 million per occurrence and \$2 million aggregate
 - v. Plan deductible will be no higher than \$5,000 per occurrence

2. Product Liability Insurance

- a. Essential for manufacturing operations:
 - i. Protection against claims related to product defects or contamination
 - ii. Coverage for recall expenses
 - iii. Plan will cover \$1 million per occurrence and \$2 million aggregate
 - iv. Plan deductible will be no higher than \$5,000 per occurrence

3. Property Insurance

- a. To protect your cultivation and manufacturing facilities:
 - i. Coverage for buildings, equipment, and inventory
 - ii. Protection against fire, theft, and natural disasters
 - iii. Business interruption coverage
 - iv. Consider crop insurance for cultivated cannabis

4. Workers' Compensation Insurance

- a. Mandatory for businesses with employees in Massachusetts:
 - i. Coverage for work-related injuries and illnesses
 - ii. Typical policy provides wage replacement and medical benefits

5. Cyber Liability Insurance

- a. Important for protecting sensitive customer and business data:
 - i. Coverage for data breaches and cyber attacks
 - ii. Typically includes incident response and recovery costs

6. Professional Liability Insurance

- a. Also known as Errors and Omissions (E&O) insurance:
 - i. Protects against claims of negligence or failure to perform professional duties
 - ii. Particularly important for product manufacturing and quality control

7. Commercial Auto Insurance
 - a. If your business uses vehicles:
 - i. Coverage for company-owned vehicles
 - ii. Non-owned and hired auto coverage for employees using personal vehicles for work
8. Umbrella Insurance
 - a. Provides additional liability coverage:
 - i. Extends over and above primary liability policies
 - ii. Recommended limits of \$5-10 million, depending on business size and risk profile
9. Directors and Officers (D&O) Insurance
 - a. Protects company leadership:
 - i. Coverage for claims related to management decisions
 - ii. Important for attracting investors and board members
10. Environmental Liability Insurance
 - a. Specific to the cannabis industry:
 - i. Covers pollution-related claims
 - ii. Important for cultivation operations using pesticides or fertilizers
11. Additional Considerations
 - a. Compliance: Ensure all insurance policies comply with Massachusetts cannabis regulations and licensing requirements specifically 935 CMR 500.101(1) and 935 CMR 500.105(10).
 - b. Policy Limits: Adjust coverage limits based on your specific business operations, size, and risk assessment.
 - c. Specialized Cannabis Insurance: Work with brokers experienced in cannabis industry insurance to access tailored policies.
 - d. Risk Management: Implement robust risk management practices to potentially lower premiums and reduce claim likelihood.
 - e. Regular Reviews: Schedule annual policy reviews to ensure coverage keeps pace with your growing business.
 - f. Claims History: Maintain a clean claims history to keep premiums manageable.
 - g. Bundling: Consider bundling policies with a single insurer for potential cost savings.

Chispa Tres LLC – Separating Recreational from Medical Operations

3.15.2025

Chispa Tres LLC will only be participating in the recreational market

Chispa Tres LLC – Record Keeping Policies and Procedures

3.15.2025

As a licensed microbusiness cultivator and product manufacturer in Massachusetts, Chispa Tres LLC is committed to maintaining accurate and comprehensive records in compliance with state regulations. The following policies and procedures outline our record keeping practices:

General Requirements

1. All records shall be maintained for a minimum of four years, either on-premises or at an off-site facility.
2. Records must be kept in written or electronic form and be readily accessible for inspection by the Cannabis Control Commission (CCC) upon request.
3. A monthly analysis of equipment and sales data will be conducted to ensure no software has been installed that could manipulate or alter sales data.

Cultivation Records

1. Document all agricultural inputs used during cultivation, including:
 - Beneficial insects
 - Pesticides
 - Fertilizers
 - Soil amendments
 - Other plant protection products
2. Record harvests, including:
 - Harvest dates
 - Unique batch names for each harvest
 - Number of plants harvested
 - Status of harvested plants (hanging, drying, or curing)
3. Maintain a system to link harvested cannabis to its lot number or harvest date.
4. Record the dry weight of trimmed cannabis yielded.

Manufacturing Records

For each hash and hash rosin, maintain a record containing:

1. Selection and documentation of source, lot/batch numbers, and expiration dates.
2. Verification of product label compliance.
3. Strength of the cannabis product.
4. Date of preparation.
5. Names of persons who performed each step of the manufacturing process.
6. Total quantity of product manufactured in each lot.
7. Detailed manufacturing steps to ensure product replication.
8. Type of container used for products with specific storage requirements.
9. Expiration date of the cannabis products.
10. Results of quality control procedures.
11. Instructions for use, storage, and handling of the cannabis product.

Sales and Inventory Records

1. Maintain a complete and accurate record of all cannabis item sales.
2. Use a point-of-sale (POS) system approved by the CCC.
3. Conduct monthly analyses of equipment and sales data to ensure no manipulation has occurred.
4. Adopt separate accounting practices for marijuana sales.
5. Track total number of cannabis item transactions.
6. Document taxes collected.

Additional Record Keeping Requirements

1. Energy and water consumption data.
2. Waste disposal records, including trimming waste.
3. Transportation manifests for any cannabis or cannabis products transferred to or from the facility.
4. Employee training records, maintained for four years.
5. Results of any required testing or analysis of cannabis or cannabis products.
6. Visitor logs, including dates, names, and purpose of visits.

Reporting

1. Submit required reports to the CCC as specified in regulations, including annual statistical data.
2. Report any discrepancies or issues identified during monthly analyses immediately to the CCC.

Security and Confidentiality

1. Ensure all records are securely stored and accessible only to authorized personnel.
2. Implement data backup procedures to prevent loss of information.

Chispa Tres - Financial Record Keeping Policies and Procedures

3.15.2025

1. General Requirements

- a. All financial records shall be maintained in accordance with generally accepted accounting principles (GAAP).
- b. Financial records must be kept for a minimum of 4 years.
- c. Records shall be made available for inspection by the Cannabis Control Commission upon request during normal business hours.

2. Record Keeping System

- a. Utilize an electronic accounting and record keeping system to track all financial transactions.
- b. The system shall have the capability to generate reports on:
 - i. Revenue by product type
 - ii. Expenses by category
 - iii. Inventory levels and values
 - iv. Accounts payable and receivable
 - v. Tax liabilities

3. Required Financial Records

- a. The following financial records must be maintained:
 - i. General ledger
 - ii. Bank statements and reconciliations
 - iii. Sales records and invoices
 - iv. Purchase records and invoices
 - v. Inventory records
 - vi. Payroll records
 - vii. Tax returns and supporting documentation
 - viii. Annual financial statements

4. Cash Handling Procedures

- a. Maintain a log of all cash transactions.
- b. Perform daily cash counts and reconciliations.
- c. Store cash in a secure safe when not in use.
- d. Make regular cash deposits to the company's bank account.
- e. Limit cash on premises to necessary operating amounts.

5. Banking Procedures

- a. Maintain separate bank accounts for business and personal funds.
- b. Reconcile bank statements monthly.

- c. Review all electronic fund transfers and payments.
- d. Maintain documentation for all banking transactions.

6. Tax Compliance

- a. Track and report all applicable state and local cannabis taxes.
- b. File quarterly estimated tax payments.
- c. Maintain records of all tax payments and filings.

7. Inventory Tracking

- a. Perform monthly physical inventory counts.
- b. Reconcile physical inventory to inventory records.
- c. Track costs associated with manufacturing.
- d. Value inventory according to GAAP principles.

8. Audit Procedures

- a. Conduct internal audits of financial records quarterly.
- b. Engage an independent CPA to perform an annual financial audit.
- c. Address any audit findings or recommendations promptly.

9. Reporting

- a. Generate monthly financial statements including:
 - i. Income statement
 - ii. Balance sheet
 - iii. Cash flow statement
- b. Provide financial reports to management monthly.
- c. File annual financial reports with the Cannabis Control Commission.

Energy Efficiency Compliance Policy for Chispa Tres LLC

4.21.2025

1. Introduction

Chispa Tres LLC, as a small batch cannabis indoor cultivator and hash and hash rosin manufacturer in Massachusetts, is committed to energy efficiency and environmental sustainability while maintaining the high quality of our connoisseur-grade products. This policy outlines our approach to energy compliance and best practices for our microbusiness cultivation and product manufacturing operations.

2. Energy Efficiency Measures

2.1 Lighting Systems

- Where practicable utilize high-efficiency LED lighting systems with a minimum efficacy of 1.9 $\mu\text{mol/J}$ for all horticultural lighting.
- Implement automated lighting controls to optimize photoperiods and reduce unnecessary energy consumption.

2.2 HVAC and Dehumidification

- Install energy-efficient HVAC systems, such as variable refrigerant flow units or ductless split systems.
- Where practicable employ integrated HVAC systems with on-site heat recovery for reheating dehumidified air.
- Use standalone dehumidifiers with energy factors of at least 1.77-2.41 L/kWh.

2.3 Insulation and Building Envelope

- Maintain high-insulation standards in cultivation and product manufacturing rooms to minimize heat loss and reduce HVAC load.
- Regularly inspect and maintain the building envelope to ensure optimal thermal performance.

3. Energy Monitoring and Reporting

- Implement an energy management system to track and monitor electricity consumption across all operations.
- Conduct monthly energy audits to identify areas for improvement and track progress towards efficiency goals.
- Prepare and submit annual energy usage reports to the Cannabis Control Commission as required by regulations.

4. Renewable Energy Integration

- Explore the feasibility of installing on-site solar panels to offset a portion of our electricity needs.
- Consider participating in community solar projects or purchasing renewable energy credits to further reduce our carbon footprint.

5. Best Management Practices

- Regularly train staff on energy-efficient operating procedures and the importance of conservation.
- Continuously assess new opportunities for reduced energy usage and improved efficiency in our cultivation and manufacturing processes.
- Maintain detailed records of all energy efficiency measures and their impact on our operations.

6. Compliance and Certification

- Engage a licensed professional engineer, licensed architect, or certified energy auditor to review and certify our energy compliance measures annually.
- Ensure all equipment and practices meet or exceed the minimum standards set by the Cannabis Control Commission and relevant state regulations.

7. Continuous Improvement

- Identify potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities. *935 CMR 500.105(15)*
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. *935 CMR 500.105(15)*
- Stay informed about advancements in energy-efficient technologies specific to cannabis cultivation and manufacturing.
- Regularly review and update this policy to reflect new regulations, technologies, and best practices in the industry.

Chispa Tres LLC – Restricting Access to Age 21 and Older

4.21.2025

Restricting Access to Individuals 21 Years of Age and Older

Purpose

This policy ensures compliance with Massachusetts regulations regarding age restrictions for all employees, registered agents, visitors, and consumers at the Marijuana Establishment, as required by 935 CMR 500.000 et seq.

1. Age Requirements for Employees and Registered Agents

- All employees and registered agents must be at least 21 years of age in compliance with 935 CMR 500.029 and 500.030.
- Prior to hire or registration, all prospective employees and agents will be required to provide valid, government-issued photo identification to verify their age.
- The Human Resources department will maintain records of age verification for all employees and agents as part of the onboarding process, in compliance with 935 CMR 500.029 and 500.0302.

2. Age Requirements for Visitors

- All visitors to the premises must be at least 21 years of age, as defined by 935 CMR 500.00225.
- Visitors will be required to present valid, government-issued photo identification at the point of entry.
- Security personnel will verify the age of all visitors before allowing access to the premises.
- No exceptions will be made for individuals under 21 years of age.

3. Age Requirements for Consumers

- All consumers entering the Marijuana Retailer must be at least 21 years of age, unless the establishment is co-located with a Medical Marijuana Treatment Center, in which case additional medical patient access rules apply as outlined in 935 CMR 500.050(5).
- If co-located and the individual is younger than 21 years old but 18 years of age or older, they shall not be admitted unless they produce an active medical registration card issued by the DPH. If the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active medical registration card, and they are accompanied by a personal caregiver with an active medical registration card. In addition to the medical registration card, registered qualifying patients 18 years of age

and older and personal caregivers must also produce proof of identification. *935 CMR 500.140(3) (co-located retailer)*

- Consumers must present valid, government-issued photo identification at the point of sale and/or entry, which will be verified by trained staff.
- Any consumer who cannot provide acceptable proof of age will be denied entry and service.

4. Process to Prevent Access by Individuals Under 21

To ensure that no individual under 21 years of age is allowed on the premises, the following procedures will be implemented:

- **Entry Control:**
 - All access points to the premises will be staffed by trained security personnel during business hours.
 - Security staff will request and verify government-issued photo identification from every individual seeking entry, regardless of apparent age.
 - Acceptable forms of identification include a valid driver's license, state identification card, passport, or military ID.
- **Employee and Agent Monitoring:**
 - Human Resources will conduct age verification for all new hires and agents before granting access credentials.
 - Access badges or credentials will only be issued upon successful age verification.
- **Visitor Management:**
 - All visitors must sign in at the reception/security desk and present valid identification for age verification.
 - Visitors under 21 years of age will be denied entry and escorted off the premises if necessary.
- **Consumer Verification:**
 - At retail points of entry, staff will verify the age of every consumer prior to allowing access to sales areas.
 - Any individual unable to provide valid proof of age will be refused entry and service.
- **Recordkeeping:**
 - The establishment will maintain logs of all age verification checks at entry points.
 - Any incident involving attempted access by an underage individual will be documented and reported to management.
- **Training:**
 - All staff responsible for age verification will receive training on acceptable forms of identification and procedures for denying access to underage individuals.

5. Notification to the Commission

- The Commission will be informed of these procedures and any updates as part of the establishment's compliance reporting process, as required by 935 CMR 500.050 and related regulations.

6. Enforcement

- Any employee or agent who knowingly allows an individual under 21 years of age to access the premises will be subject to disciplinary action, up to and including termination, and may be reported to the Commission for further action.

This policy will be reviewed annually and updated as necessary to ensure ongoing compliance with state regulations.

Chispa Tres LLC - Quality Control and Testing Policies and Procedures

4.21.2025

1. Product Testing

- a. All cannabis and cannabis products will be tested by an independent testing laboratory licensed by the Cannabis Control Commission (CCC) before sale or transfer in compliance with 935 CMR500.140(9).
- b. Testing will be conducted for at least the following:
 - i. Cannabinoid profile and potency
 - ii. Terpene profile
 - iii. Residual solvents
 - iv. Microbiological contaminants
 - v. Mycotoxins
 - vi. Heavy metals
 - vii. Pesticide residues
- c. Samples for testing will be collected according to the CCC's sampling protocols.
- d. No product will be sold or transferred until passing test results are received from the laboratory.

2. Quality Control Measures

- a. Implement a tracking system to monitor all cannabis products from acquisition through manufacturing and testing.
- b. Maintain detailed logs of all manufacturing and testing activities.
- c. Conduct regular in-house quality checks on products before submitting them for laboratory testing.
- d. Quarantine any products that do not meet specifications or fail testing.

3. Standard Operating Procedures (SOPs) - Including Sanitary Practices

- a. Develop and maintain written SOPs for all cultivation, manufacturing, and quality control processes.
- b. Train all employees on SOPs and quality control protocols.
- c. Conduct regular internal audits to ensure compliance with SOPs.
- d. Update SOPs as needed based on regulatory changes or process improvements.
- e. **Sanitary Processing of Marijuana:** Ensure that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed

below (required for cultivators, product manufacturers, micro businesses, and craft marijuana cooperatives per 935 CMR 500.105(3)):

- i. Well-cured and generally free of seeds and stems.
 - ii. Free of dirt, sand, debris, and other foreign matter.
 - iii. Free of contamination by mold, rot, other fungus, and bacterial diseases.
 - iv. Prepared and handled on food-grade stainless steel tables.
 - v. Packaged in a secure area in compliance with 935 CMR 500.105(3).
- f. **Food Handler Requirements:** All agents whose job includes contact with marijuana are subject to the requirements for food handlers specified in 105 CMR 300.000.
- g. **Agent Sanitary Practices:** Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:
- i. Maintaining adequate personal cleanliness.
 - ii. Washing hands appropriately (935 CMR 500.105(3)).
- h. **Hand-Washing Facilities:** Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands (935 CMR 500.105(3)).
- i. **Space Adequacy:** There shall be sufficient space for the placement of equipment and storage of materials as necessary for the maintenance of sanitary operations (935 CMR 500.105(3)).
- j. **Waste Management:** Litter and waste shall be properly removed to minimize odor development and the potential for waste attracting and harboring pests, according to 935 CMR 500.105(12) and 935 CMR 500.105(3).
- k. **Facility Construction:** Floors, walls, and ceilings shall be constructed to be adequately kept clean and in good repair (935 CMR 500.105(3)).
- l. **Contact Surface Maintenance:** All contact surfaces shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination (935 CMR 500.105(3)).
- m. **Toxic Item Storage:** All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana (935 CMR 500.105(3)).
- n. **Water Supply:** The water supply shall be sufficient for necessary operations (935 CMR 500.105(3)).
- o. **Plumbing:** Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment (935 CMR 500.105(3)).
- p. **Toilet Facilities:** The establishment shall provide its employees with adequate, readily accessible toilet facilities (935 CMR 500.105(3)).
- q. **Storage and Transportation:** Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination (935 CMR 500.105(3)).

- r. **Contamination Notification:** The establishment shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary (935 CMR 500.160(2)).

4. Record Keeping

- a. Maintain records of all testing results for a minimum of one year.
- b. Document any product recalls or returns due to quality issues.
- c. Keep detailed batch records for all products manufactured.
- d. Retain certificates of analysis from testing laboratories.

5. Recall Procedures

- a. Establish a recall plan to quickly remove any products found to be contaminated or otherwise unfit for consumption.
- b. Maintain a system to track all products by batch to facilitate recalls if needed.
- c. Designate a recall coordinator to oversee any recall activities.

6. Continuous Improvement

- a. Regularly review quality control data to identify trends or areas for improvement.
- b. Solicit feedback from customers on product quality and consistency.
- c. Stay informed on industry best practices and emerging technologies for quality assurance.

Chispa Tres LLC - Qualifications and Training Policy

4.21.2025

1. Introduction

Chispa Tres LLC is committed to producing high-end, connoisseur-grade cannabis products through small-batch indoor cultivation and hash/hash rosin manufacturing. Our dedication to quality and attention to detail requires a comprehensive qualifications and training policy to ensure compliance with Massachusetts regulations and industry best practices.

2. Qualifications

2.1 General Requirements

All employees must:

- Be at least 21 years of age
- Pass a background check as required by Massachusetts law
- Demonstrate a strong work ethic and attention to detail
- Show a passion for cannabis cultivation and/or product manufacturing
- Chispa Tres LLC will provide a list of anticipated positions and their qualifications in compliance with *935 CMR 500.105*

2.2 Specific Role Requirements

Cultivation Technicians:

- Minimum of 1-year experience in indoor cannabis cultivation
- Knowledge of plant biology and cannabis genetics
- Familiarity with integrated pest management techniques

Extraction Technicians:

- Minimum of 1-year experience in cannabis extraction, preferably with hash and hash rosin
- Understanding of solventless extraction methods
- Knowledge of terpene preservation techniques

Quality Control Specialists:

- Background in chemistry, biology, or related field preferred
- Experience with laboratory testing procedures

- Attention to detail and ability to maintain meticulous records

3. Training Program

3.1 Responsible Vendor Training

- All new employees shall complete the Responsible Vendor Program within 90 days of being hired in compliance with *935 CMR 500.105(2)*
- All current owners, managers, and employees shall complete the Responsible Vendor Program after July 1, 2019 or when available in compliance with *935 CMR 500.105(2)*

3.2 Company-Specific Training

Orientation (All Employees):

- Company mission, values, and standard operating procedures
- Workplace safety and emergency protocols
- Compliance with Massachusetts cannabis regulations

Cultivation Training:

- Indoor growing techniques and best practices
- Nutrient management and plant health monitoring
- Harvesting and curing procedures

Extraction Training:

- Hash and hash rosin production methods
- Equipment operation and maintenance
- Product consistency and quality control measures

3.3 Good Manufacturing Practices (GMP)

All employees involved in product manufacturing will receive training on GMP principles, including:

- Quality management systems
- Facility and equipment maintenance
- Production and process controls
- Documentation and record-keeping

3.4 Advanced Core Curriculum (Optional)

Employees are encouraged to participate in Advanced Core Curriculum training offered by certified Responsible Vendor Trainers, focusing on:

- Cultivation techniques
- Energy and environmental best practices
- Social justice in the cannabis industry

4. Ongoing Education

4.1 Regular Updates

Quarterly training sessions will be held to:

- Review changes in Massachusetts cannabis regulations
- Discuss industry trends and innovations
- Share best practices and lessons learned

4.2 Professional Development

- Chispa Tres LLC will ensure that employees receive a minimum of eight (8) hours of ongoing training annually. *935 CMR 500.105(2)*
- Employees are encouraged to attend industry conferences, workshops, and seminars to enhance their skills and knowledge.

5. Documentation and Compliance

- Responsible Vendor Program documentation must be retained for four (4) years in compliance with *935 CMR 500.105(2)*
- All training activities will be documented and records maintained for at least one year
- Employees must sign acknowledgment forms after completing each training session
- Training effectiveness will be evaluated through regular performance assessments

6. Policy Review

This qualifications and training policy will be reviewed annually and updated as necessary to ensure compliance with Massachusetts regulations and industry best practices.

Chispa Tres LLC – Personnel and Background Check Policy

9.26.2025

1. Staffing Plan with Job Descriptions and Records Compliance (935 CMR 500.105(9), 935 CMR 500.105(1))

The company will operate with a lean staffing model consisting of two full-time employees and one part-time employee. This staffing plan is designed to meet operational needs while maintaining compliance with 935 CMR 500.105 requirements for documentation and recordkeeping.

- **Principal / Operations Manager (Full-Time):**

The Principal, who is the first full-time employee, oversees the entire operations of the microbusiness. Responsibilities include managing cultivation and production activities, ensuring compliance with all regulatory requirements, supervising staff, overseeing quality control, and handling communications with the Cannabis Control Commission. The Principal is also responsible for maintaining records related to operations, employee files, and regulatory documentation.

- **Assistant / Production Specialist (Full-Time):**

The second full-time employee serves as the Assistant to the Principal and participates in all operational tasks. Their primary focus is on manufacturing activities including preparation, processing, and packaging of hash and rosin products. This role supports compliance efforts by assisting in recordkeeping for production batches and inventory management, as well as helping enforce health and safety protocols.

- **Part-Time Operations Assistant:**

The part-time employee assists with general operational support including cultivation, production and packaging tasks. This role provides flexibility to manage workload fluctuations and supports the full-time team in maintaining operational efficiency and product quality. The part-time employee's duties include assisting with trimming, packaging, labeling, and maintaining cleanliness and organization in the cultivation and production areas.

2. Records to be Maintained:

The company will maintain detailed personnel records for all employees, including job descriptions, hiring documentation, training records, background checks, Commission-issued registration cards,

and any performance or disciplinary records. All records will be securely stored and available for review by the Commission to ensure compliance with regulations.

3. Mandatory Background Checks

- a. All prospective employees, contractors, and volunteers must undergo a comprehensive background check before beginning work at the microbusiness. This includes:
 - i. Criminal record check (CORI)
 - ii. Sex offender registry check
 - iii. Employment verification
 - iv. Education verification
 - v. Professional license/certification verification (if applicable)

4. Additional Personnel Policies

- a. **Drug and Alcohol Policy:**
 - i. Zero tolerance for use of cannabis or alcohol while on duty.
 - ii. The company will maintain alcohol, smoke, and drug-free workplace policies in compliance with 935 CMR 500.105(1).
- b. **Security Protocols**
 - i. Employees must wear ID badges at all times on premises.
 - ii. Limited access areas restricted to authorized personnel only.
 - iii. Procedures for reporting security incidents or suspicious activity.
- c. **Hygiene and Safety Standards**
 - i. Proper sanitation and personal hygiene requirements
 - ii. Protocols for safe handling of cannabis plants and products
 - iii. Proper use of personal protective equipment
- d. **Inventory Control**
 - i. Procedures for tracking cannabis from seed-to-sale
 - ii. Protocols to prevent and report diversion
- e. **Confidentiality**
 - i. Non-disclosure agreements required
 - ii. Policies on protecting proprietary cultivation/manufacturing processes
 - iii. A plan describing how confidential information will be maintained in accordance with 935 CMR 500.105(1).
- f. **Compliance Training**
 - i. Ongoing education on state and local cannabis regulations
 - ii. Procedures for maintaining licensing requirements
- g. **Employee Dismissal Policy**
 - i. The company will adhere to 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, as required by 935 CMR 500.105(1).

Chispa Tres LLC - Diversity Plan

10.1.2025

As a cannabis microbusiness licensee in Massachusetts participating in Tier 1 cultivation and product manufacturing, Chispa Tres LLC is committed to promoting equity and diversity in our workforce, management, and business relationships.

This plan outlines our goals, programs, and measurements to foster inclusion of minorities, women, veterans, persons with disabilities, LGBTQ+ people and other diverse groups of people. This plan is tailored to Commission-approved areas of diversity, which include people of color, particularly Black, African American, Hispanic, Latino, and Indigenous people; women; Veterans; persons with disabilities; and LGBTQ+ people.

1. Diversity Plan Goals

The company is committed to promoting diversity and inclusivity across all employment and contracting opportunities. The following specific goals will be implemented to ensure meaningful participation by individuals from Commission-approved groups:

2. Hiring Goals

- At least 50% of employees will be women.
- At least 20% of employees will be people of color, including but not limited to Black, African American, Hispanic, Latino, and Indigenous individuals.
- At least 10% of employees will be veterans.
- At least 10% of employees will be persons with disabilities.
- At least 10% of employees will be individuals who identify as LGBTQ+.

3. Contracting Goals

- At least 20% of all contracts will be with businesses majority-owned or managed by women.
- At least 25% of all contracts will be with businesses majority-owned or managed by people of color.
- At least 10% of all contracts will be with businesses majority-owned or managed by veterans.
- At least 10% of all contracts will be with businesses majority-owned or managed by persons with disabilities.
- At least 10% of all contracts will be with businesses majority-owned or managed by LGBTQ+ individuals.

4. Strategies and Programs

- Advertise all job openings through platforms and organizations that have strong connections to each diverse community, such as women’s organizations, veteran support organizations, disability advocacy groups, and LGBTQ+ networks.
- Regularly review and, if necessary, revise recruiting protocols to ensure accessibility and inclusivity for applicants from all targeted groups.
- Partner with diversity-focused business directories and the Massachusetts Supplier Diversity Office to identify qualified diverse contractors and suppliers.
- Create an internal annual training program focused on unconscious bias, cultural competency, and anti-discrimination policies.
- Attend and/or host at least one local community event or job fair per year to directly reach and engage diverse candidates.

5. Measurement and Accountability

- Track and document the number of employment opportunities posted through diversity-focused channels.
- Maintain annual records of the demographics of applicants, hires, and retained employees in each category.
- Record the percentage of contract dollars awarded to businesses in each diversity category.
- Evaluate and report progress against diversity goals to the Commission annually. If goals are not met, revise strategies as needed, including outreach, advertising, and targeted partnerships.
- Maintain all documentation related to hiring, contracting, and outreach to demonstrate good-faith efforts and provide these to the Commission as required.

6. Programs and Initiatives

a. Recruitment and Hiring

- i. Partner with community organizations and job training programs serving underrepresented groups to expand our candidate pool.
 1. *Frequency: As needed when hiring*
 2. *Duration: Ongoing*
 3. *Methods: Direct contact with organizations, participation in job fairs, and targeted advertising.*
- ii. Implement blind resume screening to reduce unconscious bias in the hiring process.
 1. *Frequency: For all new hires*
 2. *Duration: Throughout the screening process*
 3. *Methods: Redacting personal information from resumes before review.*

- iii. Require diverse candidate slates for all open positions.
 - 1. *Frequency: For all open positions*
 - 2. *Duration: Throughout the hiring process*
 - 3. *Methods: Ensuring a diverse pool of candidates is considered for each role.*

b. Retention and Advancement

- i. Establish a mentorship program pairing employee from underrepresented groups with senior staff.
 - 1. *Frequency: Ongoing*
 - 2. *Duration: Continuous effort*
 - 3. *Methods: Ongoing training and mentoring on all aspects of the business*
- ii. Provide leadership development training and opportunities for employees from diverse backgrounds.
 - 1. *Frequency: Ongoing*
 - 2. *Duration: Continuous effort*
 - 3. *Methods: Ongoing training and mentoring on all aspects of the business*
- iii. Conduct regular pay equity analyses to ensure fair compensation across all demographics.
 - 1. *Frequency: Bi-annually*
 - 2. *Duration: Ongoing*
 - 3. *Methods: Statistical analysis of pay data, review of job descriptions and responsibilities.*

c. Supplier Diversity

- i. Actively seek out and build relationships with diverse suppliers, including those certified by the Massachusetts Supplier Diversity Office.
 - 1. *Frequency: Ongoing*
 - 2. *Duration: Continuous effort*
 - 3. *Methods: Attending supplier diversity events, networking, and online research.*
- ii. Set targets for procurement from minority-owned, women-owned, veteran-owned, and other diverse businesses.
 - 1. *Frequency: Annually*
 - 2. *Duration: Ongoing*
 - 3. *Methods: Setting specific spending goals, tracking procurement data, and reporting progress.*
- iii. Offer technical assistance and support to help diverse suppliers meet our procurement needs.

1. *Frequency: As needed*
2. *Duration: Project-based*
3. *Methods: Providing guidance, resources, and mentorship.*

Our leadership team will review these metrics quarterly and adjust our strategies as needed to ensure progress toward our diversity goals. We will also submit an annual report on our diversity efforts to the Cannabis Control Commission upon our annual license renewal. By implementing this diversity plan, Chispa Tres LLC aims to create a more equitable and inclusive cannabis industry in Massachusetts while building a stronger, more innovative business.