



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP282064
Original Issued Date: 09/15/2022
Issued Date: 09/15/2022
Expiration Date: 09/15/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: CNA Stores, Inc.

Phone Number: 781-589-3192
Email Address: rob@cnastores.com

Business Address 1: West Street
Business City: Winchendon Business State: MA Business Zip Code: 01475
Business Address 2:
Mailing Address 1: 57 South Hunt Road
Mailing City: Amesbury Mailing State: MA Mailing Zip Code: 01913
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Veteran-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: 45.93 Percentage Of Control: 45.93
Role: Owner / Partner Other Role:
First Name: Robert Last Name: DiFazio Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 44.13 Percentage Of Control: 44.13

Role: Owner / Partner Other Role:

First Name: Billie Last Name: Haggard Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: CNA Stores, Inc. Entity DBA:

Email: rob@cnastores.com Phone: 781-589-3192

Address 1: 57 S Hunt Road Address 2:

City: Amesbury State: MA Zip Code: 01913

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$1000000 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Robert Last Name: DiFazio Suffix:

Marijuana Establishment Name: CNA Stores, Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Amesbury Marijuana Establishment State: MA

Individual 2

First Name: Robert Last Name: DiFazio Suffix:

Marijuana Establishment Name: CNA Stores, Inc. Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Amesbury Marijuana Establishment State: MA

Individual 3

First Name: Robert Last Name: DiFazio Suffix:

Marijuana Establishment Name: CNA Stores, Inc. Business Type: Marijuana Retailer

Marijuana Establishment City: Amesbury Marijuana Establishment State: MA

Individual 4

First Name: Robert **Last Name:** DiFazio **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Haverhill **Marijuana Establishment State:** MA

Individual 5

First Name: Robert **Last Name:** DiFazio **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Winchendon **Marijuana Establishment State:** MA

Individual 6

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Amesbury **Marijuana Establishment State:** MA

Individual 7

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Amesbury **Marijuana Establishment State:** MA

Individual 8

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Amesbury **Marijuana Establishment State:** MA

Individual 9

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Haverhill **Marijuana Establishment State:** MA

Individual 10

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Winchendon **Marijuana Establishment State:** MA

Individual 11

First Name: Robert **Last Name:** DiFazio **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Boston **Marijuana Establishment State:** MA

Individual 12

First Name: Billie **Last Name:** Haggard **Suffix:**
Marijuana Establishment Name: CNA Stores, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Boston **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: West Street
Establishment Address 2: Assessors Map 1 Parcel 99 and Map 5A1 Parcel 2
Establishment City: Winchendon **Establishment Zip Code:** 01475

Approximate square footage of the Establishment: 120000

How many abutters does this property have?: 42

Have all property abutters have 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	CNA Stores_Plan to Remain Compliant With Local Zoning (Winchendon).pdf	pdf	6256d27b5e5622000820ab68	04/13/2022
Certification of Host Community Agreement	CNA Stores_COM Documentation_Winchendon_Redacted-Signed.pdf	pdf	62680b6f4d83ec000a36aaf3	04/26/2022
Certification of Host Community Agreement	CNA Stores_HCA Certification Form_Winchendon.pdf	pdf	62913ad63bea2b0008cb4fe3	05/27/2022

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	CNA Stores_Plan for Positive Impact.pdf	pdf	6298d11beb816b00086f5c41	06/02/2022
Other	CNA Stores_VNEOC Letters.pdf	pdf	6298d120eb816b00086f5c55	06/02/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Robert

Last Name: DiFazio Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: Billie

Last Name: Haggard Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Secretary of Commonwealth - Certificate of Good Standing	CNA Stores_SoC CoGS_2.17.22.pdf	pdf	6255dc403eefeb000a2b359a	04/12/2022
Department of Revenue - Certificate of Good standing	CNA Stores_DoR CoGS_2.18.22.pdf	pdf	6255dc413eefeb000a2b35ae	04/12/2022
Articles of Organization	CNA Stores_Articles of Organization.pdf	pdf	6255dc465e56220008202284	04/12/2022
Bylaws	CNA Stores_Bylaws.pdf	pdf	6255dc4c3eefeb000a2b35d7	04/12/2022
Department of Revenue - Certificate of Good standing	CNA Stores_DUA CoGS_2.18.22.pdf	pdf	626099834d83ec000a30dc4d	04/20/2022

No documents uploaded

Massachusetts Business Identification Number: 001336643

Doing-Business-As Name:

DBA Registration City: Winchendon

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	CNA Stores_Plan for Obtaining Liability Insurance.pdf	pdf	6256d29d5e5622000820ac1d	04/13/2022
Business Plan	CNA Stores_Business Plan_Winchendon.pdf	pdf	62609a38560e3c00087aa1de	04/20/2022
Proposed Timeline	CNA Stores_Proposed Timeline_Winchendon.pdf	pdf	62609a5d4d83ec000a30dca8	04/20/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Types of products Manufactured.	CNA Stores_Types of Products Manufactured.pdf	pdf	6256d2da3eefeb000a2bb933	04/13/2022
Method used to produce products	CNA Stores_Method Used to Produce Products (PM).pdf	pdf	6256d2e35e5622000820ad59	04/13/2022
Sample of unique identifying marks used for branding	CNA Stores_Samples of Unique Identifying Marks Used for Branding.pdf	pdf	6256d2ea5e5622000820ad6d	04/13/2022
Restricting Access to age 21 and older	CNA Stores_Plan for Restricting Access to Age 21 and Older.pdf	pdf	6256d2f13eefeb000a2bb965	04/13/2022
Security plan	CNA Stores_Security Plan.pdf	pdf	6256d2f65e5622000820adab	04/13/2022
Prevention of diversion	CNA Stores_Prevention of Diversion.pdf	pdf	6256d2fd5e5622000820add1	04/13/2022
Storage of marijuana	CNA Stores_Storage of Marijuana.pdf	pdf	6256d3053eefeb000a2bb9aa	04/13/2022
Transportation of marijuana	CNA Stores_Transportation of Marijuana.pdf	pdf	6256d3063eefeb000a2bb9be	04/13/2022
Inventory procedures	CNA Stores_Inventory Procedures.pdf	pdf	6256d30c5e5622000820adf9	04/13/2022
Quality control and testing	CNA Stores_Quality Control and Testing (PM).pdf	pdf	6256d3145e5622000820ae15	04/13/2022

Personnel policies including background checks	CNA Stores_Personnel Policies Including Background Checks.pdf	pdf	6256d3183eefeb000a2bb9ef	04/13/2022
Record Keeping procedures	CNA Stores_Recordkeeping Procedures.pdf	pdf	6256d3253eefeb000a2bba2f	04/13/2022
Maintaining of financial records	CNA Stores_Maintaining of Financial Records.pdf	pdf	6256d32b5e5622000820ae5a	04/13/2022
Qualifications and training	CNA Stores_Qualifications and Training.pdf	pdf	6256d33b3eefeb000a2bba71	04/13/2022
Energy Compliance Plan	CNA Stores_Energy Compliance Plan (PM).pdf	pdf	6256d3413eefeb000a2bba85	04/13/2022
Safety Plan for Manufacturing	CNA Stores_Product Manufacturing Safety Plan.pdf	pdf	6256d3495e5622000820aecc	04/13/2022
Plan to Obtain Marijuana	CNA Stores_Plan for Obtaining Marijuana (PM).pdf	pdf	6256d3513eefeb000a2bba99	04/13/2022
Diversity plan	CNA Stores_Diversity Plan.pdf	pdf	6298d153eb816b00086f5d68	06/02/2022

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

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

Monday From: Open 24 Hours Monday To: Open 24 Hours

Tuesday From: Open 24 Hours Tuesday To: Open 24 Hours

Wednesday From: Open 24 Hours **Wednesday To:** Open 24 Hours

Thursday From: Open 24 Hours **Thursday To:** Open 24 Hours

Friday From: Open 24 Hours **Friday To:** Open 24 Hours

Saturday From: Open 24 Hours **Saturday To:** Open 24 Hours

Sunday From: Open 24 Hours **Sunday To:** Open 24 Hours



PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

CNA Stores, Inc. (“CNA Stores”) will remain compliant at all times with the local zoning requirements set forth in the Town of Winchendon’s Zoning Bylaw. In accordance with Winchendon’s Zoning Bylaw, CNA Stores’ proposed Marijuana Cultivator and Marijuana Product Manufacturer is located in the Rural Residential Zoning District where non-retail marijuana facilities are allowed pursuant to receipt of a Special Permit.

In compliance with Winchendon’s Zoning Bylaw, the property is not located within 500 feet of any of the following pre-existing uses:

- Any public or private school providing education in kindergarten or grades 1 through 12;
- Any drug or alcohol rehabilitation facility;
- Any correctional facility, half-way house, or similar facility; or
- Any playground or athletic fields, recreational facilities, youth centers such as a YMCA, and parking areas for the bike path or similar facility in which children commonly congregate.

As required by Winchendon’s Zoning Bylaw, CNA Stores will apply for a Special Permit and Site Plan Approval from the Planning Board. CNA Stores shall file an annual report with the Planning Board, and CNA Stores will appear before the Planning Board to present the report no later than January 31st of each year, providing a copy of all current applicable state licenses to demonstrate continued compliance with the conditions of the Special Permit.

CNA Stores will apply for any other local permits required to operate a Marijuana Cultivator and Marijuana Product Manufacturer facility at the proposed location. CNA Stores will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Cultivator and Marijuana Product Manufacturer at CNA Stores’ proposed location.

CNA Stores has already attended several meetings with various municipal officials and boards to discuss CNA Stores’ plans for a proposed Marijuana Cultivator and Marijuana Product Manufacturer facility and has executed a Host Community Agreement with Winchendon. CNA Stores will continue to work cooperatively with various municipal departments, boards, and officials to ensure that CNA Stores’ facility remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

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): April 11, 2022
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: March 23, 2022

b. Name of publication: The Gardner News

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: March 17, 2022

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: March 31, 2022

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:

CNA Stores, Inc.

Name of applicant's authorized representative:

Robert DiFazio

Signature of applicant's authorized representative:

Robert DiFazio



Teacher strikes spread across US

Pandemic workloads, low pay taking a toll

Erin Richards
USA TODAY

In January, Minneapolis Public Schools students stayed home for two weeks as the omicron COVID-19 variant surged and schools shuttered. This month, schools have closed for another two weeks, and counting, because of a teacher strike.

With no deal reached over the weekend, classes remained canceled Monday, the district said.

Minneapolis teachers have been picketing for better pay and benefits, smaller classes and more student mental health services. From Illinois to California, teachers unions are actively on strike or preparing to have members walk off the job over many of the same demands.

"I think you are going to see more militant teacher strikes over the next couple of years," said Jon Shelton, a University of Wisconsin-Green Bay professor who studies teachers unions.

The heaviest COVID-19 wave is subsiding, but two years of pandemic teaching have taken a toll. Educators are navigating health protocols, staff shortages, students' academic challenges, parents' frustrations and national criticism of how they manage matters of race and sexuality in schools.

Many also feel disrespected. One of three teachers say they've been verbally harassed or threatened by a student; almost as many report being harassed or threatened by a parent or a student, according to a new survey by the American Psychological Association.

Unions demand pay raises for teachers and for lower-wage school workers, where turnover and shortages have sharply increased. They also want more support services for students, many of whom are struggling academically or socially after two years of disrupted learning.

But the actions aimed at improving schools also are halting in-person instruction after students have missed extraordinary amounts of it.

The organizing has echoes of the "Red for Ed" teacher strike movement in



Teachers, including Minneapolis Federation of Teachers Local 59, and Education Support Professionals, rally at the Minnesota State Capitol in St. Paul.
STAR TRIBUNE VIA AP

2018 and 2019, which started in West Virginia when teachers with no legal right to strike walked out to campaign for more money for schools. Teachers secured raises, and the movement inspired educators elsewhere, including in Republican states such as Arizona, Kentucky and North Carolina.

Money is still at the forefront of concerns — although unions say they're focused on supporting struggling students and addressing teachers' workloads.

Superintendents understand teachers are underpaid and recognize how hard they're working, said Dan Domenech, executive director of the School Superintendents Association. But strikes are adding additional stress, he

said.

"Parents are upset over education, they want their kids attending school in person, and now here's another thing coming that has nothing to do with the pandemic that's going to keep kids out of school," Domenech said.

In Minneapolis last week, educators rallied at the governor's mansion to ask for schools to receive more of the state's \$9 billion budget surplus.

"We're looking for contract language around class-size caps, mental health supports, recruiting and retaining educators of color, and living wages for education support professions," Shaun Laden, a Minneapolis union leader, said in an update last week. "We don't have a budget crisis. We have a values and pri-

orities crisis."

Nearby St. Paul Public Schools teachers averted a planned March 8 strike with a last-minute deal on raises, class-size limits and \$3,000 bonuses for educators. The bonuses will be paid for by the district's federal COVID-19 relief money.

In suburban Chicago, classes for 4,200 students in the Proviso High School District 209 also have been canceled for two weeks as teachers strike for higher pay. District leaders say they cannot sustain the raises the union wants. Negotiations are ongoing; the district says it hopes to bring students back March 28 after a regularly scheduled spring break.

In California, Sacramento's teachers union announced plans to strike starting Wednesday for higher pay and more staffing. Sacramento City Unified schools want to reach an agreement before that, but buildings will close if the strike proceeds, the district said Friday in an update.

In Sonoma County, teachers in one district just ended a six-day strike, while teachers in another nearby voted to authorize a strike over many of the same concerns.

Thousands of students have stayed home or gone to buildings with no teachers.

Domenech said administrators often have little financial flexibility to meet teachers' demands. Districts are funded primarily through local property taxes, and many communities don't want to pay more to support teacher raises, he said. And, he added, the federal relief money is great, but it runs out in three years.

Another economic problem: Schools receive state money based on enrollment and often attendance, said William Jones, a labor historian at the University of Minnesota. So while many districts are flush with pandemic-relief cash, urban schools that have lost students are struggling.

"(Many) districts are really poor, despite more federal funding and despite state surpluses," Jones said. "It's weird that we have forces keeping money away from the one institution we need to pay attention to right now."

Spring break shootings: Miami Beach emergency brings curfew

Mayor: 'This isn't your father or your mother's spring break'

David Fischer
ASSOCIATED PRESS

MIAMI BEACH, Fla. — City of Miami Beach officials declared a state of emergency on Monday and an upcoming curfew, bidding to curb violent incidents at spring break that saw five people wounded in two separate shootings.

Miami Beach Mayor Dan Gelber and City Manager Alina Hudak announced the emergency order at an afternoon news conference. It includes a curfew for the South Beach area that starts early Thursday after midnight and runs through the weekend.

The city commission will hold an

emergency meeting Tuesday to discuss the declaration, and Hudak said she plans to recommend the curfew be extended through the next weekend.

Thousands of college students and other young people gather annually in Miami Beach for spring break, and this is the second year in a row that officials for the South Florida city have declared a state of emergency in this famed partying spot.

The mayor said about 100 guns have been seized over the past four weeks, and several police officers have been injured while controlling the crowds.

"We can't endure this anymore. We just simply can't," Gelber said. "This

isn't your father or your mother's spring break. This is something wholly different."

Gelber noted the five people were shot over the weekend despite 371 police officers being deployed.

Three people were wounded early Sunday on a street crowded with spring breakers in the city's South Beach neighborhood, police said. Two victims wounded at the scene were taken to a hospital, while doctors at another hospital reported a third person arrived there with a gunshot wound. All were expected to survive.

Early Monday, officers were patrolling about a block from the Sunday morning shooting site when they heard gunshots, police said. The officers found

two women with gunshot wounds. Police said their wounds weren't life-threatening.

At the urging of some residents, city officials have been working in recent years to crack down on unruly behavior in South Beach. But efforts to curb the excessive drinking and violence have raised complaints about racism, classism and business practices.

More than 1,000 people were arrested last March, when the city imposed an 8 p.m. curfew. Authorities at the time sent military style vehicles to disperse predominantly Black crowds with rubber bullets, prompting criticism from Black activists.

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**Community
Announce**
lost, found, happy ads, novena...

Announcements

PASTA SUPPER, Saturday
March 26th from 5pm 6pm at
St. Vincent de Paul Church
in Baldwinville. Meals are
"To Go" The cost is \$10 and
must be reserved by calling
(978) 939 8969.

**Careers
Jobs**
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General

Full time Referral/Front
desk position. Must have
the ability to multitask, be
detail oriented, and have
good computer skills.
Email resume to
GFM6099@gmail.com.

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CITY OF GARDNER
PURCHASING
DEPARTMENT
REQUEST FOR
PROPOSALS

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NOTICE OF SALE OF
PROPERTY

Proposals will be received at
the office of the City
Purchasing Agent, Room 217
City Hall, Gardner, MA until
Wednesday, April 15th, 2022
at 12:00 p.m. and at that
time and place opened for
the sale of the following City
owned properties:

- Land at 177 West Street (Assessors Map M27/23/23) consisting of approximately 10,850 square feet of land, with an assessed value of \$43,200.
- Land at 20 Rock Street (Assessors Map M22/1/21) consisting of approximately 24,318 square feet of land, with an assessed value of \$49,200.
- Land at Parker Street (Assessors Map M22/4/24) consisting of approximately 13,456

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square feet, with an
assessed value of \$80,100.

Procedure and award shall
be subject to the provisions
of Chapter 30B of the
General Laws of the
Commonwealth, including all
current amendments. The
City of Gardner reserves the
right to reject any and all
proposals, wholly or in part,
and to accept bids deemed to
be in the best interest of the
City.
Parcels are to be sold "as is"
with no guarantees for
further construction and/or
improvements to the parcel.
There may be re use
restrictions on the
properties, as detailed in the
procurement documents.
Successful proposer will be
required to make full
payment on the sale price
plus a deed recording fee no
later than thirty (30) days
following the opening of
proposals. Successful
proposer shall also be

Govt Public Notices
required to sign, under
penalties of perjury, a
statement that neither they
nor any other person who
would gain equity to the
property, have tax
delinquencies.

Further information on this
invitation is available on the
City's website at
www.gardner.ma.gov under
the Bid Opportunities
section.
by Joshua Cormier
Purchasing Director

Public Notices

NOTICE OF COMMUNITY
OUTREACH MEETING
Notice is hereby given that
CNA Stores, Inc. will hold a
Community Outreach Meet-
ing during the Winchendon
Board of Selectmen's Meet-
ing on April 11, 2022 at 6:30
PM in Town Hall, 4th Floor
Auditorium, 109 Front Street,
Winchendon to discuss the
proposed siting of an Adult

Public Notices

Use Marijuana Cultivation
and Product Manufacturing
Facility at the property iden-
tified as Assessors Map 1
Parcel 99 and Map 5A1
Parcel 2 on West St. in
Winchendon.
This Community Outreach
Meeting will be held in
accordance with the Massa-
chusetts Cannabis Control
Commission's applicable
requirements set forth in
M.G.L. ch. 94G and 935 CMR
500.000 et seq. A copy of the
meeting presentation will be
made available at least 24
hours prior to the meeting by
emailing rob@cnastores.com.
Interested members of the
community will have the
opportunity to ask questions
and receive answers from
company representatives
about the proposed facility
and operations. Questions
can be submitted in advance
by emailing
rob@cnastores.com or asked
during the meeting.

**PHOTOS
are worth a
thousand words
included in
your ad.**

NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that CNA Stores, Inc. will hold a Community Outreach Meeting during the Winchendon Board of Selectmen's Meeting on **April 11, 2022** at 6:30 PM in Town Hall, 2nd Floor Auditorium, 109 Front Street, Winchendon to discuss the proposed siting of an Adult Use Marijuana Cultivation and Product Manufacturing Facility at the property identified as Assessors Map 1 Parcel 99 and Map 5A1 Parcel 2 on West St. in Winchendon.

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

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

From: [Wendy Stevens](#)
To: [Bridgette Nikisher](#)
Subject: RE: [Winchendon MA] Notice of Community Outreach Meeting (Sent by Bridgette M Nikisher, b.nikisher@vicentesederberg.com)
Date: Thursday, March 17, 2022 4:29:07 PM

Hi,
Received and will post. Thank you

Debra Skinner
Asst. Town Clerk

-----Original Message-----

From: cmsmailer@civicplus.com [<mailto:cmsmailer@civicplus.com>]
Sent: Thursday, March 17, 2022 4:20 PM
To: Wendy Stevens <wstevens@townofwinchendon.com>
Subject: [Winchendon MA] Notice of Community Outreach Meeting (Sent by Bridgette M Nikisher, b.nikisher@vicentesederberg.com)

Hello wstevens,

Bridgette M Nikisher (b.nikisher@vicentesederberg.com) has sent you a message via your contact form (<https://www.townofwinchendon.com/user/58/contact>) at Winchendon MA.

If you don't want to receive such e-mails, you can change your settings at <https://www.townofwinchendon.com/user/58/edit>.

Message:

Good afternoon,

On behalf of CNA Stores, Inc., please find attached notice that CNA Stores, Inc. will hold a Community Outreach Meeting during the Winchendon Board of Selectmen's Meeting on April 11, 2022 at 6:30 PM. Could you kindly confirm receipt of this notice?

Please let me know if you have any questions or would like additional information.

Best,
Bridgette Nikisher
b.nikisher@vicentesederberg.com

CAUTION: This email is from an EXTERNAL contact. Please do not open attachments, or click on links from unknown or suspicious senders.

NOTICE OF COMMUNITY OUTREACH MEETING

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U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)

- Return Receipt (hardcopy) \$
- Return Receipt (electronic) \$
- Certified Mail Restricted Delivery \$
- Adult Signature Required \$

PRUDENTIAL CENTER 02199
 Postmark Here
 MAR 31 2022

7020 3160 0002 2726 6475

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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- Adult Signature Required \$

PRUDENTIAL CENTER 02199
 Postmark Here
 MAR 31 2022

7020 3160 0002 2726 6482

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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Extra Services & Fees (check box, add fee as appropriate)

- Return Receipt (hardcopy) \$
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- Adult Signature Required \$

PRUDENTIAL CENTER 02199
 Postmark Here
 MAR 31 2022

7020 3160 0002 2726 6512

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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OFFICIAL USE

Certified Mail Fee
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Extra Services & Fees (check box, add fee as appropriate)

- Return Receipt (hardcopy) \$
- Return Receipt (electronic) \$
- Certified Mail Restricted Delivery \$
- Adult Signature Required \$

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 MAR 31 2022

USPS

7020 3160 0002 2726 6505

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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PRUDENTIAL CENTER 02199
 Postmark Here
 MAR 31 2022

USPS

7020 3160 0002 2726 6499

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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:

CNA Stores, Inc.

2. Name of applicant’s authorized representative:

Robert DiFazio

3. Signature of applicant’s authorized representative:

Robert DiFazio

4. Name of municipality:

Winchendon

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

Keith Hickey



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).*):

khickey@townofwinchendon.com

8. Host community agreement execution date:

12/21/20





CNA STORES, INC.

**PLAN TO POSITIVELY IMPACT AREAS OF
DISPROPORTIONATE IMPACT**

1. Overview

CNA Stores, Inc. (“CNA Stores”) is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

- a. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
- b. Commission-designated Economic Empowerment Priority applicants;
- c. Commission-designated Social Equity Program participants;
- d. Massachusetts residents who have past drug convictions; and
- e. Massachusetts residents with parents or spouses who have drug convictions.

To support such populations, CNA Stores has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) and has identified and created goals/programs to positively impact past or present residents of the City of Haverhill.

2. Goals

In order for CNA Stores to positively impact past or present residents of the City of Haverhill, CNA Stores has established the following goals:

- a. Devise a social media campaign that promotes sustainable, socially, and economically reparative practices in the cannabis industry through no less than monthly postings targeted towards Haverhill residents, particularly those who have past drug convictions or who were otherwise disproportionately harmed by cannabis prohibition;
- b. Donate at least \$5,000.00 annually to Veterans Northeast Outreach Center, a local Haverhill charity that provides housing and support services to homeless veterans in Haverhill and provides food pantry services to Haverhill residents; and
- c. Create jobs in in the adult-use cannabis industry for individuals who are past or present residents of a disproportionately impacted community, with the goal of 25% of staff being past or present residents of a disproportionately impacted community.

3. Programs

CNA Stores has developed specific programs to effectuate its stated goals to positively impact past or present residents of the City of Haverhill. Such programs will include the following:

- a. Develop and maintain a social media campaign targeted towards Haverhill residents (particularly those who have past drug convictions or who were otherwise disproportionately harmed by cannabis prohibition) through no less than monthly postings on Facebook or LinkedIn. Topics will include local expungement processes and events, local resources for people with past drug convictions, and details regarding local industry seminars and events that are geared toward people disproportionately harmed by cannabis prohibition. The social media campaign will comply with any and all regulatory requirements including 935 CMR 500.105(4).

- b. Provide a monetary donation to Veterans Northeast Outreach Center in the amount of \$5,000.00.
- c. Give hiring preference to past or present residents of the City of Haverhill, whereby qualified candidates for open job postings with equal qualifications will be selected if they self-identify as past or present residents of Haverhill.

4. Measurements

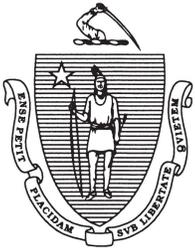
The Chief Operations Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure CNA Stores continues to meet its commitments. Such measurable outcomes, in accordance with CNA Stores' goals and programs described above, include:

- a. Documenting all postings of CNA Stores' social media campaign, which will be updated at a minimum of monthly.
- b. Donating a minimum of \$5,000.00 to Veterans Northeast Outreach Center and documenting such donation in accordance with recordkeeping policies and generally accepted accounting principles.
- c. Documenting the number of jobs provided to past or present residents of the City of Haverhill.

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

5. Acknowledgements

- a. As identified above, CNA Stores intends to donate to Veterans Northeast Outreach Center and acknowledges that Veterans Northeast Outreach Center has been contacted and will receive the donation described herein. CNA Stores has received written confirmation from Veterans Northeast Outreach Center to this effect.
- b. CNA Stores will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.
- c. Any actions taken, or programs instituted, by CNA Stores will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: February 17, 2022

To Whom It May Concern :

I hereby certify that according to the records of this office,
CNA STORES, INC.

is a domestic corporation organized on **July 13, 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: 22020479370

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: L1754916544
Notice Date: February 18, 2022
Case ID: 0-001-426-809



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



CNA STORES INC
57 S HUNT RD
AMESBURY MA 01913-4422

000020

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, CNA STORES 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: 001336643

ARTICLE I

The exact name of the corporation is:

CNA STORES, INC.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CNP	\$0.00000	275,000	\$0.00	0

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.

A. LIMITATION OF DIRECTOR LIABILITY. EXCEPT AS REQUIRED BY APPLICABLE LAW, NO DIRECTOR OF THE CORPORATION SHALL HAVE ANY PERSONAL LIABILITY TO THE CORPORATION OR ITS STOCKHOLDERS FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS A DIRECTOR. THE PRECEDING SENTENCE SHALL NOT ELIMINATE OR LIMIT THE LIABILITY OF A DIRECTOR FOR ANY ACT OR OMISSION OCCURRING PRIOR TO THE DATE UPON WHICH SUCH PROVISION BECOMES EFFECTIVE. B. INDEMNIFICATION. THE CORPORATION SHALL, TO THE EXTENT PERMITTED BY G.L.C. 156D, INDEMNIFY ALL PERSONS WHO HAVE SERVED OR MAY SERVE AT ANY TIME AS OFFICERS OR DIRECTORS OF THE CORPORATION AND THEIR HEIRS, EXECUTORS, ADMINISTRATORS, SUCCESSORS, AND ASSIGNS, FROM AND AGAINST ANY AND ALL LOSS AND EXPENSE, INCLUDING AMOUNTS PAID IN SETTLEMENT BEFORE OR AFTER SUIT IS COMMENCED, AND REASONABLE ATTORNEY'S FEES, ACTUALLY AND NECESSARILY INCURRED AS A RESULT OF ANY CLAIM, DEMAND, ACTION, PROCEEDING, OR JUDGMENT THAT MAY HAVE BEEN ASSERTED AGAINST ANY SUCH PERSONS, OR IN WHICH THESE PERSONS ARE MADE PARTIES BY REASON OF THEIR BEING OR HAVING BEEN OFFICERS OR DIRECTORS OF THE CORPORATION. THIS RIGHT OF INDEMNIFICATION SHALL NOT EXIST IN RELATION TO MATTERS AS TO WHICH IT IS ADJUDGED IN ANY ACTION, SUIT OR PROCEEDING THAT THESE PERSONS ARE LIABLE FOR NEGLIGENCE OR MISCONDUCT IN THE PERFORMANCE OF DUTY. THE INDEMNIFICATION RIGHTS PROVIDED HEREIN (I) SHALL NOT BE DEEMED EXCLUSIVE OF ANY OTHER RIGHTS TO WHICH THOSE INDEMNIFIED MAY BE ENTITLED UNDER ANY LAW, AGREEMENT, VOTE OF SHAREHOLDERS OR OTHERWISE; AND (II) SHALL INURE TO THE BENEFIT OF THE HEIRS, EXECUTORS AND ADMINISTRATORS OF SUCH PERSONS ENTITLED TO INDEMNIFICATION. THE CORPORATION MAY, TO THE EXTENT AUTHORIZED FROM TIME TO TIME BY THE BOARD OF DIRECTORS, GRANT INDEMNIFICATION RIGHTS TO OTHER EMPLOYEES OR AGENTS OF THE CORPORATION OR OTHER PERSONS SERVING THE CORPORATION AND SUCH RIGHTS MAY BE EQUIVALENT TO, OR GREATER OR LESS THAN, THOSE SET FORTH HEREIN. C. PARTNERSHIP. THE CORPORATION MAY BE A PARTNER TO THE MAXIMUM EXTENT PERMITTED BY LAW. D. MINIMUM NUMBER OF DIRECTORS. THE BOARD OF DIRECTORS MAY CONSIST OF ONE OR MORE INDIVIDUALS, NOTWITHSTANDING THE NUMBER OF SHAREHOLDERS. E. SHAREHOLDER ACTION WITHOUT A MEETING BY LESS THAN UNANIMOUS CONSENT. ACTION REQUIRED OR PERMITTED BY CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS TO BE TAKEN AT A SHAREHOLDERS' MEETING MAY BE TAKEN WITHOUT A MEETING BY SHAREHOLDERS HAVING NOT LESS THAN THE MINIMUM NUMBER OF VOTES NECESSARY TO TAKE THE ACTION AT A MEETING AT WHICH ALL SHAREHOLDERS ENTITLED TO VOTE ON THE ACTION ARE PRESENT AND VOTING. F. AUTHORIZATION OF DIRECTORS TO MAKE, AMEND OR REPEAL BYLAWS. THE BOARD OF DIRECTORS MAY MAKE, AMEND OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY VIRTUE OF AN EXPRESS PROVISION IN CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, THE ARTICLES OF ORGANIZATION OR THE BYLAWS REQUIRES ACTION BY THE SHAREHOLDERS.

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

© 2001 - 2018 Commonwealth of Massachusetts
All Rights Reserved

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:

July 13, 2018 02:16 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**BYLAWS
OF
CNA STORES, INC.**

BYLAWS OF CNA STORES, INC.

ARTICLE I: GENERAL

Section 1.01 Name and Purposes. The name of the Corporation is CNA STORES, INC. (the “Corporation”). The purpose of the Corporation shall be as set forth in the Corporation’s Articles of Organization as adopted and filed with the Office of the Secretary of State of the Commonwealth of Massachusetts (as now in effect or as hereafter amended or restated from time to time, the “Articles of Organization”) pursuant to Chapter 156D of the Massachusetts General Laws, as now in effect and as hereafter amended, or the corresponding provision(s) of any future Massachusetts General Law (“Chapter 156D”).

Section 1.02 Articles of Organization. These Bylaws (“Bylaws”), the powers of the Corporation and its shareholders and Board of Directors, and all matters concerning the conduct and regulation of the business of the Corporation, shall be subject to the provisions in regard thereto that may be set forth in the Articles of Organization. In the event of any conflict or inconsistency between the Articles of Organization and these Bylaws, the Articles of Organization shall control.

Section 1.03 Corporate Seal. The Board of Directors may adopt and alter the seal of the Corporation. The seal of the Corporation, if any, shall, subject to alteration by the Board of Directors, bear its name, the word “Massachusetts” and the year of its incorporation.

Section 1.04 Fiscal Year. The fiscal year of the Corporation shall commence on January 1, and end on the following December 31 of each year, unless otherwise determined by the Board of Directors.

Section 1.05 Location of Principal Office of the Corporation. The principal office of the Corporation shall be located at such place within the Commonwealth of Massachusetts as shall be fixed from time to time by the Board of Directors, and if no place is fixed by the Board of Directors, such place as shall be fixed by the President.

ARTICLE II: SHAREHOLDERS

Section 2.01 Place of Meeting. Meetings of the shareholders shall be held at any place within or without the Commonwealth of Massachusetts that may be designated by the Board of Directors. Absent such designation, meetings shall be held at the principal office. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote electronic communication. If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders, may participate in a meeting of shareholders by means of electronic transmission by and to the Corporation or electronic video screen communication; and, may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or held solely by means of electronic transmission by and to the Corporation or electronic video screen communication, subject to the conditions imposed by applicable law.

Section 2.02 Annual Meeting. The annual meeting of shareholders of this Corporation shall be held on such date and at such time as may be designated from time to time by the Board

of Directors. At the annual meeting, Directors shall be elected, and any other business may be transacted that is within the power of the shareholders and allowed by law; *provided, however*, that unless the notice of meeting, or the waiver of notice of such meeting, sets forth the general nature of any proposal to (i) approve or ratify a contract or transaction with a Director or with a corporation, firm or association in which a Director has an interest; (ii) amend the Articles of Organization of this Corporation; (iii) approve a reorganization or merger involving this Corporation; (iv) elect to wind up and dissolve this Corporation; or (v) effect a plan of distribution upon liquidation otherwise than in accordance with the liquidation preferences of outstanding shares with liquidation preferences, no such proposal may be approved at an annual meeting.

Section 2.03 Special Shareholders' Meetings. Special meetings of the shareholders, for any purpose whatsoever, may be called at any time by the President, the Board of Directors or by shareholders entitled to cast not less than ten percent (10%) of the corporation's voting power. Any person entitled to call a special meeting of shareholders (other than the Board of Directors) may make a written request to the Chair of the Board (if any), President, Vice President (if any) or Secretary, specifying the general purpose of such meeting and the date, time and place of the meeting, which date shall be not less than fifteen (15) days nor more than sixty (60) days after the receipt by such officer of the request. Within twenty (20) days after receipt of the request, the officer receiving such request forthwith shall cause notice to be given to the shareholders entitled to vote at such meeting, stating that a meeting will be held on the date and at the time and place requested by the person or persons requesting a meeting and stating the general purpose of the meeting. If such notice is not given twenty (20) days after receipt by the officer of the request, the person or persons requesting the meeting may give such notice. No business shall be transacted at a special meeting unless its general nature shall have been specified in the notice of such meeting; *provided, however*, that any business may be validly transacted if the requirements for such validity, as provided in Section 2.12 of these Bylaws, are met.

Section 2.04 Shareholder Nominations and Proposals. For business (including, but not limited to Director nominations) to be properly brought before an annual or special meeting by a shareholder, the shareholder or shareholders of record intending to propose the business (the "**Proposing Shareholder**") must have given written notice of the Proposing Shareholder's nomination or proposal, either by personal delivery or by the United States mail to the Secretary of the Corporation. In the case of an annual meeting, the Proposing Shareholder must give such notice to the Secretary of the Corporation no earlier than one hundred and twenty (120) calendar days and no later than ninety (90) calendar days before the date such annual meeting is to be held. If the current year's meeting is called for a date that is not within thirty (30) days of the anniversary of the previous year's annual meeting, notice must be received not later than ten (10) calendar days following the day on which public announcement of the date of the annual meeting is first made. In no event will an adjournment or postponement of an annual meeting of shareholders begin a new time period for giving a Proposing Shareholder's notice as provided above.

For business to be properly brought before a special meeting of shareholders, the notice of meeting sent by or at the direction of the person calling the meeting must set forth the nature of the business to be considered. A shareholder or shareholders who have made a written request for a special meeting pursuant to Section 2.03 of these Bylaws may provide the information required for notice of a shareholder proposal under this Section 2.04 simultaneously with the written request for the

meeting submitted to the Secretary or within ten (10) calendar days after delivery of the written request for the meeting to the Secretary.

A Proposing Shareholder's notice shall include as to each matter the Proposing Shareholder proposes to bring before either an annual or special meeting:

- (a) The name(s) and address(es) of the Proposing Shareholder(s).
- (b) The classes and number of shares of capital stock of the Corporation held by the Proposing Shareholder.
- (c) If the notice regards the nomination of a candidate for election as Director:
 - (i) The name, age, business and residence address of the candidate;
 - (ii) The principal occupation or employment of the candidate; and
 - (iii) The class and number of shares of the Corporation beneficially owned by the candidate.
- (d) If the notice is in regard to a proposal other than a nomination of a candidate for election as Director, a brief description of the business desired to be brought before the meeting and the material interest of the Proposing Shareholder of such proposal.

Section 2.05 Notice of Shareholders' Meeting. Except as otherwise provided by law, written notice stating the place, day and hour of the meeting, and, in case of a special meeting, the nature of the business to be transacted at the meeting, shall be given at least ten (10) days and not more than sixty (60) days before the meeting. In the case of an annual meeting, notice will include matters the Corporation's Board of Directors intends, at the time of the giving of the first of such notices, to present to the shareholders for action, and in the case of a meeting at which Directors are to be elected, the names of nominees that the Board of Directors, at the time of the giving of the first of such notices, intends to present to the shareholders for election. Proof that notice was given shall be made by affidavit of the Secretary, assistant Secretary, transfer agent or Director, or of the person acting under the direction of any of the foregoing, who gives such notice, and such proof of notice shall be made part of the minutes of the meeting. Such affidavit shall be prima facie evidence of the giving of such notice. It shall not be necessary to state in a notice of any meeting of shareholders as a purpose thereof any matter relating to the procedural aspects of the conduct of such meeting.

Notice shall be given personally, by electronic transmission or by mail, by or at the direction of the Secretary, or the officer or person calling the meeting, to each shareholder entitled to vote at the meeting. If remote participation in the meeting has been authorized by the Board of Directors, the notice shall also provide a description of the means of any electronic transmission by and to the Corporation or electronic video screen communication by which shareholders may be considered present and may vote and otherwise participate at the meeting.

If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records

of the Corporation, with postage thereon prepaid. Notice may be given to the shareholder by electronic transmission. Notice by electronic transmission is deemed given when the notice satisfies any of the following requirements:

- (a) Transmitted to a facsimile number provided by the shareholder for the purpose of receiving notice.
- (b) Transmitted to an electronic mail address provided by the shareholder for the purpose of receiving notice.
- (c) Posted on an electronic network, with a separate notice sent to the shareholder at the address provided by the shareholder for the purpose of alerting the shareholder of a posting.
- (d) Communicated to the shareholder by any other form of electronic transmission consented to by the shareholder.

Notice shall not be given by electronic transmission to a shareholder after either (i) the Corporation is unable to deliver two consecutive notices to such shareholder by such means or (ii) the inability to deliver such notices to such shareholder becomes known to any person responsible for giving such notices. Any person entitled to notice of a meeting may file a written waiver of notice with the Secretary either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person objects, at the beginning of the meeting, to the lawfulness of the convening of the meeting and except that attendance is not a waiver of any right to object to conducting business at a meeting that is required to be included in the notice of the meeting, but not so included.

Section 2.06 Shareholder Approvals. Notwithstanding any other provision of these Bylaws, the shareholders shall be entitled to exercise their right to approve, by not less than a majority vote of all outstanding shares entitled to vote at a meeting of the shareholders, of the following actions proposed to be taken by the Corporation, its officers or the Board of Directors:

- (a) The formation, acquisition, substantial sale of the assets, merger or disposal of any subsidiary companies of the Corporation;
- (b) The acquisition or disposal of any real property of the Corporation;
- (c) The issuance of a distribution of any profits of the Corporation to the shareholders; and
- (d) Any amendment to any shareholder agreement or other agreement by which the shareholders of the Corporation have consented to be bound with respect to shares or equity securities in the Corporation;

provided, further, that notwithstanding any other provision of these Bylaws, the shareholders shall be entitled to exercise their right to approve, by not less than a sixty percent (60%) super-majority vote of all outstanding shares entitled to vote at a meeting of the shareholders, of the following action proposed to be taken by the Corporation, its officers or the Board of Directors:

- (e) The issuance of new shares or equity securities in the Corporation or the introduction of new shareholders to the Corporation;
- (f) Corporation's purchase of shares or equity securities in the Corporation;
- (g) A decision by the Board to change the nature of the business of the Corporation or commencement of a new business by the Corporation;
- (h) A substantial sale of the assets of the Corporation or merger or disposal of business by the Corporation;
- (i) Borrowing capital in excess of ONE MILLION UNITED STATES DOLLARS (\$1,000,000.00 USD); and
- (j) Capital expenditures in excess of ONE MILLION UNITED STATES DOLLARS (\$1,000,000.00 USD).

Section 2.07 Fixing the Record Date. For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be the date specified by the Board of Directors in the notice of the meeting. If no date is specified by the Board of Directors, the record date shall be the close of business on the day before the notice of the meeting is mailed to shareholders. If no notice is sent, the record date shall be the date set by the law applying to the type of action to be taken for which a record date must be set.

In the case of action by written consent of the shareholders without a meeting, the record date shall be (a) the date fixed by the board of directors or (b) the date that the first shareholder signs the written consent if no date has been fixed by the board.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date.

Section 2.08 Quorum of and Action by Shareholders. A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one (1) or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless:

- a. The shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting.

- b. The meeting is adjourned and a new record date is set for the adjourned meeting.

The shareholders in a voting group represented in person or by proxy at a meeting of shareholders, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than one hundred and twenty (120) days after the date fixed for the original meeting, a new record date must be fixed by the Board of Directors; notice of the meeting must be given to the shareholders who are members of the voting group as of the new record date, and a new quorum for the meeting must be established.

Section 2.09 *Reserved*

Section 2.10 Conduct of Meetings. The Board of Directors may adopt by resolution rules and regulations for the conduct of meetings of the shareholders as it shall deem appropriate. At every meeting of the shareholders, the President, or in his or her absence or inability to act, a Director or officer designated by the Board of Directors, shall serve as the presiding officer. The Secretary or, in his or her absence or inability to act, the person whom the presiding officer of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

Section 2.11 Voting of Shares. Unless otherwise provided by law or in the Articles of Organization, each shareholder entitled to vote is entitled to one (1) vote for each share of common stock. Any holder of shares entitled to vote on any matter may vote part of such shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal. If a shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Section 2.12 Consent of Absentees. The transactions of any meeting of shareholders, however called or noticed, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice, or a consent to the holding of such meeting, or an approval of the minutes thereof. The waiver notice, or consent need not specify the business transacted or purpose of the meeting, except as required by Chapter 156D. All such waivers, consents or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

Section 2.13 Voting by Proxy or Nominee. Every person entitled to vote or execute consents may do so either in person or by one (1) or more agents authorized by a written proxy executed by the person or such person's duly authorized agent and filed with the Secretary of the

Corporation. A proxy is not valid after the expiration of eleven (11) months from the date of its execution, unless the person executing it specifies therein the length of time for which it is to continue in force. Except as set forth below, any proxy duly executed is not revoked, and continues in full force and effect, until an instrument revoking it, or a duly executed proxy bearing a later date, executed by the person executing the prior proxy and presented to the meeting, is filed with the Secretary of the Corporation, or unless the person giving the proxy attends the meeting and votes in person, or unless written notice of the death or incapacity of the person executing the proxy is received by the Corporation before the vote by such proxy is counted. A proxy that states on its face that it is irrevocable will be irrevocable for the period of time specified in the proxy, if held by a person (or nominee of a person) specified by law to have sufficient interest to make such proxy irrevocable and only so long as he shall have such interest, subject to Chapter 156D, § 7.22.

Section 2.14 Action by Shareholders Without a Meeting. Any action, that, under any provision of Chapter 156D may be taken at a meeting of the shareholders, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, shall be signed by the holders of the outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares are entitled to vote thereon were present and voted; *provided, however*, that unless the consents of all shareholders entitled to vote have been solicited in writing, notice shall be given (in the same manner as notice of meetings is to be given), and within the time limits prescribed by law, of such action to all shareholders entitled to vote who did not consent in writing to such action; and *provided, further*, that Directors may be elected by written consent only if such consent is unanimously given by all shareholders entitled to vote, except that action taken by shareholders to fill one (1) or more vacancies on the Board other than a vacancy created by the removal of a Director, may be taken by written consent of a majority of the outstanding shares entitled to vote.

ARTICLE III: DIRECTORS

Section 3.01 Number of Directors; Identity of Initial Directors. The authorized number of Directors of the Corporation shall be no fewer than two (2) and no greater than five (5) at any time, unless changed by an amendment to these Bylaws duly adopted in accordance with these Bylaws by the vote or written consent of a majority of the outstanding shares entitled to vote. There shall be two (2) initial Directors, who shall be:

- (a) Robert DiFazio; and
- (b) Billie Ray Haggard, Jr.

Section 3.02 Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Section 3.03 Term of Office. Directors shall hold office until the next annual meeting of shareholders and until their successors are elected.

Section 3.04 Vacancies and Newly Created Directorships. Vacancies and newly created directorships, whether resulting from an increase in the size of the Board of Directors, from

the death, resignation, disqualification or removal of a Director or otherwise, may be filled by election at an annual or special meeting of shareholders called for that purpose or by the affirmative vote of a majority of the remaining Directors then in office, even though less than a quorum of the Board of Directors. A Director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 3.05 Removal. The Board of Directors may declare vacant the office of a Director who has been declared of unsound mind by an order of the court or convicted of a felony, or who has been barred from ownership of a marijuana business by a final decision of an applicable state or local licensing authority, or otherwise in a manner provided by law.

Any or all of the Directors may be removed from office at any duly called meeting without cause by a vote of the shareholders entitled to elect them. If one (1) or more Directors are so removed at a meeting of shareholders, the shareholders may elect new Directors at the same meeting.

Section 3.06 Resignation. A Director may resign effective on giving written notice to the President, unless the notice specifies a later effective date.

Section 3.07 Meetings of Directors.

(a) Regular Meetings. A regular annual meeting of the Board shall be held immediately after, and at the same place as, the annual meeting of shareholders for the purpose of electing officers and transacting any other business. The Board may provide for other regular meetings from time to time by resolution.

(b) Special Meetings. Special meetings of the Board for any purpose or purposes may be called at any time by the President, Vice President (if any), Chairman of the Board, the Secretary, by any two (2) Directors or by one (1) Director in the event that there is only one (1) Director. Notice of the time and place of special meetings shall be delivered by mail, electronic delivery or orally. If notice is mailed, it shall be deposited in the United States mail at least two (2) days before the time of the meeting. In the case the notice is delivered either orally or by electronic delivery shall be delivered at least forty-eight (48) hours before the time of the meeting. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director whom the person giving notice has reason to believe will promptly communicate it to the Director. The notice need not specify the purpose of the meeting nor the place if it is to be held at the principal office of the Corporation.

(c) Place of Meetings. Meetings of the Board may be held at any place within or without the Commonwealth of Massachusetts that has been designated in the notice. If a place has not been stated in the notice or there is no notice, meetings shall be held at the principal office of the Corporation unless another place has been designated by a resolution duly adopted by the Board.

Section 3.08 Electronic Participation. Members of the Board may participate in a meeting through conference telephone, electronic video screen communication or other electronic transmission by and to the Corporation. Participation in a meeting by conference telephone or electronic video screen communication constitutes presence in person as long as all Directors

participating can hear one another. Participation by other electronic transmission by and to the Corporation (other than conference telephone or electronic video screen communication) constitutes presence in person at the meeting as long as participating Directors can communicate with other participants concurrently, each Director has the means to participate in all matters before the Board, including the ability to propose or object to a specific corporate action, and the Corporation implements some means of verifying that each person participating is entitled to participate and all votes or other actions are taken by persons entitled to participate.

Section 3.09 Quorum of and Action by Directors. A majority of the authorized number of Directors constitutes a quorum of the Board for the transaction of business. Every act or decision done or made by a majority of the Directors present at a meeting duly held at which a quorum is present is the act of the Board of Directors, unless Chapter 156D or the Articles of Organization require a greater number. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action is approved by at least a majority of the Directors who constitute the required quorum for such meeting. A quorum of the Directors may adjourn any Directors' meeting to meet again at a stated time and place. In the absence of quorum, a majority of the Directors present may adjourn from time to time. Notice of the time and place of a meeting that has been adjourned for more than twenty-four (24) hours shall be given to the Directors not present at the time of the adjournment.

Section 3.10 Compensation. Directors may receive compensation for their services, and the Board of Directors may authorize payment of a fixed fee and expenses of attendance, if any, for attendance at any meeting of the Board of Directors or committee thereof. A Director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity. The Directors may, from time to time, establish compensation policies of the Corporation consistent with this Section 3.10.

Section 3.11 Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors or any committee thereof under Chapter 156D may be taken without a meeting if, prior or subsequent to the action, a consent or consents thereto by all of the Directors in office, or all the committee members then appointed, is filed with the Secretary to be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such Directors.

Section 3.12 Committees of the Board of Directors. The Board of Directors, by resolution adopted by a majority of authorized Directors, may designate one (1) or more committees, each consisting of two (2) or more Directors, to serve at the pleasure of the Board and to exercise the authority of the Board of Directors to the extent provided in the resolution establishing the committee and permitted by law. The Board of Directors may adopt governance rules for any committee consistent with these Bylaws. The provisions of these Bylaws applicable to meetings and actions of the Board of Directors shall govern meetings and actions of each committee, with the necessary changes made to substitute the committee and its members for the Board of Directors and its members.

A committee of the Board of Directors does not have the authority to:

- (a) Approve actions that require approval of the shareholders or the outstanding shares.
- (b) Fill vacancies on the Board or in any committee.
- (c) Amend or repeal bylaws or adopt new bylaws.
- (d) Amend or repeal any resolution of the Board of Directors that by its terms is not so amendable or repealable.
- (e) Make a distribution to shareholders, except at a rate, in a periodic amount or within a price range set forth in the Articles of Organization or determined by the Board.

The Board of Directors, by resolution adopted by the majority of authorized Directors, may designate one (1) or more Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of the committee or for the purposes of any written action by the committee.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

ARTICLE IV: OFFICERS

Section 4.01 Positions and Election. The officers of the Corporation shall be elected by the Board of Directors and shall be a President, a Secretary, a Treasurer and all other officers as may from time to time be determined by the Board of Directors. At the discretion of the Board of Directors, the Corporation may also have other officers, including but not limited to one (1) or more Vice Presidents or assistant Vice Presidents, one (1) or more assistant Secretaries, a Chief Financial Officer and a Chief Operations Officer, as may be appointed by the Board of Directors, with such authority as may be specifically delegated to such officers by the Board of Directors. Any two (2) or more offices may be held by the same person.

Each officer shall serve until a successor is elected and qualified or until the earlier death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors.

Section 4.02 Removal and Resignation. Any officer elected or appointed by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer chosen by the Board of Directors may resign at any time by giving written notice to the Corporation. Unless a different time is specified in the notice, the resignation shall be effective upon its receipt by the President, the Secretary or the Board.

Section 4.03 Powers and Duties of Officers. The powers and duties of the officers of the Corporation shall be as provided from time to time by resolution of the Board of Directors or

by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Corporation subject to the control of the Board of Directors.

ARTICLE V: INDEMNIFICATION OF DIRECTORS AND OFFICERS

Section 5.01 Indemnification of Officers or Directors. The Corporation shall, to the extent permitted by Chapter 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Corporation and their heirs, executors, administrators, successors and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding or judgment that may have been asserted against any such persons, or in which these persons are made parties by reason of their being or having been officers or Directors of the Corporation. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit or proceeding that these persons are liable for negligence or misconduct in the performance of duty.

Section 5.02 Non-Exclusivity of Indemnification Rights and Authority to Insure. The foregoing rights of indemnification and advancement of expenses shall be in addition to and not exclusive of any other rights to which any person may be entitled pursuant to any agreement with the Corporation, or under any statute, provision of the Articles of Organization or any action taken by the Directors or shareholders of the Corporation.

The Corporation may buy and maintain insurance to protect itself and any agent against any expense asserted against them or incurred by an agent, whether or not the Corporation could indemnify the agent against the expense under applicable law or the provisions of this Article V.

ARTICLE VI: SHARE CERTIFICATES AND TRANSFER

Section 6.01 Share Certificates. Shares of the Corporation may, but need not, be represented by certificates. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. For all shares issued or transferred without certificates, the Corporation shall within a reasonable time after such issuance or transfer send the shareholder a written statement of the information required on share certificates pursuant to Chapter 156D, § 6.25(b) & (c) and § 6.27. Shareholders can request and obtain a statement of rights, restrictions, preferences and privileges regarding classified shares or a class of shares with two (2) or more series, if any, from the Corporation's principal 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 (i), the President, or a Vice President and (ii) the Chief Financial Officer, an assistant Treasurer, the Secretary or any assistant Secretary.

Section 6.02 Transfers of Shares. Transfer of shares of the Corporation shall be made only on the books of the Corporation by the registered holder thereof or by such other person as may under law be authorized to endorse such shares for transfer, or by such shareholder's attorney thereunto authorized by power of attorney duly executed and filed with the Secretary or transfer

agent of the Corporation. Except as otherwise provided by law, upon surrender to the Corporation or its transfer agent of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, cancel the old certificate and record the transaction upon its books.

Section 6.03 Registered Shareholders. The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth of Massachusetts or giving proxies with respect to those shares.

Section 6.04 Lost, Stolen, or Destroyed Certificates. The Board of Directors may issue a new share certificate in place of any certificate it previously issued that the shareholder alleges to have been lost, stolen or destroyed provided that the shareholder or the shareholder's legal representative of the lost, stolen or destroyed certificate shall give the Corporation a bond or other adequate security sufficient to indemnify the Corporation against any potential claim against the Corporation because of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VII: CORPORATE RECORDS AND INSPECTION

Section 7.01 Records. The Corporation shall maintain adequate and correct books and records of account, minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors, and a record of its shareholders, including names and addresses of all shareholders and the number and class of shares held, along with any other records required by law. The Corporation shall keep such record of its shareholders at its principal office, as fixed by the Board of Directors from time to time, or at the office of its transfer agent or registrar. The Corporation shall keep its books and records of account and minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors at its principal office, or such other location as shall be designated by the Board of Directors from time to time.

Section 7.02 Inspection of Books and Records. The Corporation's accounting books and records and minutes of proceedings of the shareholders, Board of Directors and committees of the Board of Directors shall, to the extent provided by law, be open to inspection of Directors, shareholders and voting trust certificate holders, in the manner provided by law.

Section 7.03 Certification and Inspection of Bylaws. The Corporation shall keep in its principal office the original or a copy of these Bylaws as amended or otherwise altered to date, which shall be open to inspection by the shareholders at all reasonable times during office hours.

ARTICLE VIII: MISCELLANEOUS

Section 8.01 Checks, Drafts, Etc. All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

Section 8.02 Conflict with Applicable Law or Articles of Entity Conversion. Unless the context requires otherwise, the general provisions, rules of construction and the definitions of Chapter 156D shall govern the construction of these Bylaws. These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

Section 8.03 Invalid Provisions. If any one (1) or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

Section 8.04 Emergency Management of the Corporation. In anticipation of or during an emergency, as defined in Chapter 156D, § 3.03(d), the Board, in order to conduct the ordinary business affairs of the Corporation, shall modify procedures, including, but not limited to, calling a board meeting, quorum requirements for such board meeting and designation of additional or substitute Directors; *provided*, that such modifications may not conflict with the Articles of Organization.

In anticipation of or during an emergency, the Corporation shall be able to take any and all of the following actions to conduct the Corporation's ordinary business affairs and operations:

- (a) Modify lines of succession to accommodate the incapacity of any Director, officer, employee or agent resulting from the emergency.
- (b) Relocate the principal office or designate alternative principal offices or regional offices.
- (c) Give notice to Directors in any practicable manner under the circumstances, including but not limited to publication and radio, when notice of a board meeting cannot be given in a manner prescribed by these Bylaws.
- (d) Deem that one (1) or more officers present at a board meeting is a Director as necessary to achieve a quorum for that meeting.

Section 8.05 Reports. The Corporation shall provide all shareholders with notice of the availability of annual financial reports of the Corporation before the earlier of the annual meeting of the shareholders or one hundred and twenty (120) days after the close of the fiscal year. Such financial reports shall be prepared and provided to the shareholders upon request in compliance with Chapter 156D, § 16.20.

Section 8.06 Advisement of Counsel. THE CULTIVATION, PRODUCTION AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR COMPANY, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

ARTICLE IX: AMENDMENT OF BYLAWS

Section 9.01 Amendment by Shareholders. Shareholders may adopt, amend or repeal these Bylaws by the vote or written consent of the holders of a majority of the outstanding shares entitled to vote, except as otherwise provided by law, these Bylaws or the Articles of Organization.

Section 9.02 Amendment by Directors. Subject to the rights of shareholders as provided in Article IX, and the statutory limitations of Chapter 156D, the Board of Directors may adopt, amend or repeal these Bylaws.



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

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



388117822

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

CNA Stores Inc
Attn: Emily Cullen
57 South Hunt Road
Amesbury, MA 01913

EAN: 22165640
February 18, 2022

Certificate Id:56427

The Department of Unemployment Assistance certifies that as of 2/18/2022 ,CNA Stores 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 FOR OBTAINING LIABILITY INSURANCE

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

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



CNA Stores, Inc.

Business Plan

1. EXECUTIVE SUMMARY

1.1 Mission Statement and Message from the CEO

CNA Stores, Inc. (“CNA Stores”) is a Marijuana Establishment (“ME”) committed to creating a safe and clean community environment that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

As a veteran-owned company, we aim to bring integrity and commitment to promote the growth of a responsible and legitimate cannabis industry. We will provide premium quality cannabis products, educational support, and an unparalleled experience to all of those we proudly serve.

1.2 Product

In addition to traditional Sativa, Indica, and hybrid cannabis flower, CNA Stores will offer a wide range of products and services that will allow CNA Stores to serve customers with a wide variety of needs. Products CNA Stores intends to offer include, but will not be limited to:

1. CONCENTRATES
2. TOPICAL SALVES
3. CREAMS/LOTIONS
4. PATCHES
5. ORAL MUCOSAL/SUBLINGUAL DISSOLVING TABLETS
6. TINCTURES
7. SPRAYS
8. INHALATION READY TO USE CO2 EXTRACTED OILS
9. PRE-DOSED OIL VAPORIZERS
10. INGESTION CAPSULES
11. EDIBLES

1.3 What Drives Us

CNA Stores goals include:

1. Serving customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
 2. Assisting local communities in offsetting the cost of CNA Stores operations within their communities;
 3. Hiring employees and contractors from within the communities served;
 4. Hiring employees and contractors from communities that have been particularly harmed by the war on drugs;
 5. Hiring employees from economically distressed communities and giving them the space and knowledge to flourish professionally within CNA Stores and the cannabis industry as a whole;
 6. Having a diverse and socially representative pool of employees;
 7. Empower the next generation of entrepreneurs and leaders through hiring, training, and
-

- teaching;
8. Running an environmentally friendly ME in the Commonwealth of Massachusetts through the use of efficient cultivation methods; and
 9. Creating branded marijuana products that are safe, effective, consistent, and high quality.
 10. Hiring Service-disabled veterans' employees from the local area and giving them the space and knowledge to flourish professionally within CNA Stores and the cannabis industry as a whole.

2. COMPANY DESCRIPTION

2.1 Structure

CNA Stores is a Massachusetts domestic for-profit corporation that holds Licenses from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate MEs in the Commonwealth.

2.2 Operations

CNA Stores will utilize the State mandated Metrc program for its seed-to-sale traceability system. CNA will conduct a comprehensive daily inventory audit.

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

CNA Stores will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

CNA Stores will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence.

COMPLETELY NATURAL ALTERNATIVE

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

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

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

Prior to commencing operations, CNA Stores will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of CNA Stores.

CNA Stores and CNA Stores agents will comply with all local rules, regulations, ordinances, and bylaws.

2.3 Security

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

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

A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

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

The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only CNA Stores' registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity.

All agents and visitors will be required to visibly display an ID badge, and CNA Stores will maintain a current list of individuals with access.

On-site consumption of marijuana by CNA Stores' employees and visitors will be prohibited.

CNA Stores will have security personnel on-site during business hours.

2.4 Benefits to the Municipality

CNA Stores looks forward to working cooperatively with the Town of Winchendon to ensure that CNA Stores operates as a responsible, contributing member of the Winchendon community. CNA Stores anticipates establishing a mutually beneficial relationship with Winchendon in exchange for permitting CNA Stores to site and operate in Winchendon. The Town stands to benefit in various ways, including but not limited to the following:

- Jobs:
 - An Adult Use Marijuana facility will add a multitude of full-time jobs, in addition to hiring qualified, local contractors and vendors.
 - Monetary Benefits:
 - A Host Community Agreement with significant monetary donations will provide the Town with additional financial benefits beyond local property taxes.
 - Access to Quality Product:
 - CNA Stores 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
 - Control:
 - In addition to the Commission, the Winchendon Police Department and other municipal departments will have oversight over CNA Stores' security systems and processes.
 - Responsibility:
 - CNA Stores is comprised of experienced cultivators and professionals who will be thoroughly background checked and will maintain compliance with all rules and regulations at all times.
 - Economic Development:
 - CNA Stores' construction of the facility will revitalize the community and contribute to the overall economic development of the local area.
-

3. MARKET RESEARCH

3.1 Industry

CNA Stores' proposed retail locations are Haverhill and Amesbury with a third location to be identified. Surrounding areas include Merrimac, Haverhill, West Newbury, Newburyport and Salisbury.

3.2 Customers

In Massachusetts, adult-use retail sales eclipsed \$1 billion as of October 30, 2020, and as more Marijuana Establishments become operational, the sales growth rate continues to expand month after month..

3.3 Competitors

CNA Stores' competitors include Healthy Pharms in Georgetown, Stem in Haverhill, Full Harvest Moonz in Haverhill, and Alternative Therapies Group, Amesbury.

3.4 Competitive Advantage

CNA Stores' competitive advantages over their competition include:

- Self-funded-access to deeper financial resources than the competition can be a major advantage in capital intensive industries.
- Quality-Delivering products and services that are high quality in the eyes of customers.
- Customer Satisfaction-An ability to consistently please customers is important in virtually every industry. Technology has accelerated this effect as many industries are driven by customer reviews.
- Veteran Led- A sense of purpose and values behind your organization that inspires your customers and motivates your employees.

The cannabis industry is known to be highly competitive. CNA Stores possesses several strengths which will separate CNA Stores from the competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the service offered, the location of the dispensary, the discounts offered for the products, and to some extent, the branding of the business.

3.5 Regulations

CNA Stores is a Marijuana Establishment, consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

CNA Stores will be registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity. CNA Stores will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

CNA Stores will apply for all state and local permits and approvals required to renovate and operate the facility.

CNA Stores 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.

4. PRODUCT / SERVICE

4.1 Product & Service

Our core product will be marijuana, which will come in a variety of strains and product types.

4.2 Pricing Structure

CNA Stores' pricing structure will vary based on market conditions. CNA Stores plans to produce products of superior quality and will price its products accordingly.

5. MARKETING & SALES

5.1 Growth Strategy

CNA Stores plans to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;
3. A compelling loyalty program;
4. An exemplary customer in-store experience;
5. A caring and thoughtful staff made of consummate professionals; and

CNA Stores plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of customers in the future.

5.2 Communication

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

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

CNA Stores will communicate with customers through:

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

CNA Stores will 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 its retail stores.

5.3 Sales

CNA Stores will sell its product and service by engaging customers with knowledgeable in-store personnel.

CNA Stores will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, CNA Stores will market its products and services to reach a wide range of qualified consumers.

CNA Stores 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 will 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." CNA Stores will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will 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.

5.4 Logo

CNA Stores 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.

An image of the logo can be found below:



6. TEAM

6.1 General

CNA Stores has put together a team to implement the operations of the store. CNA Stores intends to create 64 full-time staff positions within the first three years of operations in Haverhill, Amesbury, Winchendon, and one additional location.

Our Disabled Veteran-Led Company brings expertise and a unique background in business management, law enforcement, litigation/lobbying, and operational excellence. The unique combination of veterans, business management, law enforcement along with a customer service focus makes our team an ideal fit for the Massachusetts recreational use marijuana program.

As a licensed Marijuana Establishment, we will bring the Massachusetts marijuana community a variety of marijuana products and services. This includes educating the consumer on safe marijuana consumption ranging from marijuana flower, concentrates, edibles, topicals, and educational literature.

The extended experience of our management team along with our previous experience in the business operations will be the foundation on which we continue to build. We are very familiar with all products and processes. We look forward to having the opportunity to bring this experience and knowledge to Massachusetts.

CNA Stores looks forward to becoming an integral part of the Winchendon community and shall offer a safe and secure environment with access to a full line of marijuana products.

We will be primarily focused on veterans programs and charitable activities that help support our cause to bring quality marijuana to adult consumers in the Commonwealth of Massachusetts. As part of our commitment to Winchendon, we will donate a minimum of 100 hours annually to participate in community service activities. These include consumer assistance programs, community outreach programs, and various charitable donations. All will be in the interest of educating and supporting Winchendon's adult use marijuana community.

No individual on the CNA Stores team is a controlling person with over more than three licenses in a particular class of license.

6.2 Founders

Robert DiFazio

Mr. DiFazio, a service-disabled veteran, started his career in the United States Navy Nuclear Power Program and has spent the last 24 years working in mission critical environments and developing small businesses. As a 15-year resident of Amesbury, Mr. DiFazio successfully built two companies Critical Solutions Group and Critical Power Testing and Maintenance. Mr. DiFazio developed and implemented Data Center solutions to some of the nation's largest Data Center

and technology companies including: Microsoft, Facebook, Google, TD Bank Financial Group, Fannie Mae, Time Warner Cable, Tesla and many others.

Mr. DiFazio's entrepreneurial spirit led him to developed local small-town commercial property. Mr. DiFazio is Co-Owner of Warming Market in Brunswick, Maine and 100 Main St. in Amesbury, Massachusetts. Warmings Market is a convenience store located in Brunswick Maine and has been in operation since 1946. When the previous owner was looking to retire, we saw the opportunity to keep this Brunswick landmark alive and continue to serve the Brunswick community. Mr. DiFazio also has developed a commercial property located at 100 Main St in Amesbury, Massachusetts. When the previous owner was looking to exit his real estate investments Mr. DiFazio stepped in to turn the old post office built in 1905 into professional office suites. Klondike Enterprise Group was born, and 100 Main St was renovated keeping the same look and feel of the old post office.

Mr. DiFazio holds a Master's Certificate from the Cannabis Training University and has been successfully trained and certified in all areas, including; Cultivation, Extractions, Laws and Regulations, Dispensary Operations, Delivery Service Operations, and Medical Applications.

6.3 CEO / COO / CFO

Chief Executive Officer - Robert DiFazio

Robert DiFazio, a service-disabled veteran, started his career in the United States Navy Nuclear Power Program and has spent the last 24 years working in mission critical environments and developing small businesses. As a 15-year resident of Amesbury, Mr. DiFazio successfully built two companies Critical Solutions Group and Critical Power Testing and Maintenance. Mr. DiFazio developed and implemented Data Center solutions to some of the nation's largest Data Center and technology companies including: Microsoft, Facebook, Google, TD Bank Financial Group, Fannie Mae, Time Warner Cable, Tesla and many others.

For 11 years Mr. DiFazio was Chief Executive Officer and founder of Critical Solutions Group, a Service-Disabled Veteran Owned Small Business. Critical Solutions Groups data center services include commissioning, design support, construction project management and load bank services. Mr. DiFazio's diverse experience in design, operation and management of data centers enables him to cover every phase of a data center through its life-cycle, from operations and maintenance, to remote management, energy audits, project management and facilities infrastructure training. Mr. DiFazio was responsible for developing and implementing the vision and the strategy of this business until it was acquired by BGIS, a Brookfield Asset Management Company.

Mr. DiFazio's entrepreneurial spirit led him to developed local small-town commercial property. Mr. DiFazio is Co-Owner of Warming Market in

Brunswick, Maine and 100 Main St. in Amesbury, Massachusetts. Warmings Market is a convenience store located in Brunswick Maine and has been in operation since 1946. When the previous owner was looking to retire, we saw the opportunity to keep this Brunswick landmark alive and continue to serve the Brunswick community. Mr. DiFazio also has developed a commercial property located at 100 Main St in Haverhill Massachusetts. When the previous owner was looking to exit his real estate investments Mr. DiFazio stepped in to turn the old post office built in 1905 into professional office suites. Klondike Enterprise Group was born and 100 Main St was renovated keeping the same look and feel of the old post office.

In conjunction with his business interest, Mr. DiFazio spent considerable time pursuing charitable endeavors. He has been part of an Amesbury, MA Charity called LUNGSTRONG, www.lungstrong.org. LUNGSTRONG is a non-profit organization committed to funding innovative lung cancer research. To date, LUNGSTRONG has helped fund over \$2,800,000 in lung cancer research. Mr. DiFazio has also participated the Pan-Mass Challenge for last 5 years. The Pan-Mass Challenge brings together thousands of impassioned cyclists, committed volunteers, generous donors and dedicated corporate sponsors. The Pan-Mass Challenge generates more than 50% of the Jimmy Fund's annual revenue and it is Dana Farber's single largest contributor. Over the past 38 years, the Pan-Mass Challenge cyclist have ridden to raise and contribute \$598 million to cancer research.

Chief Operations Officer and Chief Financial Officer Billie Haggard

Billie Haggard, a protected-class veteran, started his career in the United States Navy Nuclear Power Program. After 13 years of honorable service, Mr. Haggard has spent the last 18 years working in mission critical environments. Mr. Haggard successfully created operating groups within private equity backed holding companies that later went on to become publicly traded companies. Mr. Haggard has been a senior leader for engineering, construction, security, and facilities departments for some of the nation's largest Data Center and technology companies including: Switch and Data, CoreSite, and Microsoft.

For the last 1.5 years, Mr. Haggard has served as the Director of Corporate Performance at Critical Solutions Group (CSG). At CSG he was responsible for organizational design, back of office support personnel and systems, and strategy to increase the capabilities of the company. In February of 2018, CSG was acquired by Brookfield Asset Management Company (BGIS) and Mr. Haggard was transitioned to BGIS to serve as the Operations Director for its largest critical environment client. Mr. Haggard's diverse experience and extensive leadership roles in critical environment enables him to cover every aspect of a data center from design, construction, to daily facilities operations. From 2015 to 2017, Mr. Haggard served as the Director for the Americas for Microsoft and was responsible for the testing and acceptance for Microsoft's owned and leased data

centers in North and South America.

Prior to that, Mr. Haggard served as the Senior Vice President and Named Executive Officer at CoreSite from 2009 to 2015. In this role, Mr. Haggard was responsible for the design, construction, maintenance, facilities staffing, and ultimately uptime, reliability and energy efficiency of Core Site's 2.5 million square feet of data center space.

From 2003 until 2009, Mr. Haggard was the Senior Technical Manager at Switch and Data, a provider of network-neutral data centers, where he oversaw all aspects of data center design and management for more than 40 data centers across North America. Prior to joining Switch and Data in 2003, Mr. Haggard held the position of Technical Manager for Lee Technologies, a data center solutions provider, focused upon data center and mission-critical facilities.

Mr. Haggard completed his Bachelor of Science in Business Management and Master of Human Resources at Colorado State University. Additionally, Mr. Haggard held positions of increasing responsibility focused upon nuclear power technology and maintenance during his 13-year career as an officer in the United States Navy. Mr. Haggard was recognized with four Naval Achievement Medals and numerous letters of commendation.

7. FINAL REMARKS

CNA Stores has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. CNA Stores hopes to bring its high-quality standards to adult-use consumers to provide them with a safe and clean community environment. CNA Stores' security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

In Massachusetts, adult-use retail sales eclipsed \$1 billion as of October 30, 2020, and as more Marijuana Establishments become operational, the sales growth rate continues to expand month after month. CNA Stores is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures and growth strategies. In doing so, CNA Stores looks forward to working cooperatively with Winchendon to help spread the benefits that this market will yield.



PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

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

In the event CNA Stores discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). CNA Stores will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), CNA Stores will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. CNA Stores will not engage in any advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. CNA Stores will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, fruit, or sporting-equipment item including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any advertising created for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.”** Pursuant to 935 CMR 500.105(6)(b), CNA Stores packaging for any marijuana or marijuana products will not use bright colors, defined as colors that are “neon” in appearance, resemble existing branded products, feature cartoons, a design, brand or name that resembles a non-cannabis consumer or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be marketed to minors. CNA Stores’ website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).



QUALITY CONTROL AND TESTING

Quality Control

CNA Stores, Inc. (“CNA Stores”) will comply with the following sanitary requirements:

1. Any CNA Stores agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any CNA Stores agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. CNA Stores’ hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in CNA Stores’ production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. CNA Stores’ facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. CNA Stores will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. CNA Stores’ floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. CNA Stores’ facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. CNA Stores’ buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. CNA Stores will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. CNA Stores acknowledges and understands that the Commission may require CNA Stores to demonstrate the intended and actual use of any toxic items found on CNA Stores' premises;
11. CNA Stores will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet CNA Stores' needs;
12. CNA Stores' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. CNA Stores will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. CNA Stores will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. CNA Stores will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

CNA Stores' vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

CNA Stores will ensure that CNA Stores' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

CNA Stores will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by CNA Stores to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

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

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

- Well-cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;

- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6).

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

Testing

CNA Stores will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

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

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

CNA Stores' marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E

Acetate (VEA) in accordance with the relevant provisions of *the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. CNA Stores acknowledges and understands that the Commission may require additional testing.

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

CNA Stores will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. CNA Stores acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of CNA Stores' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to CNA Stores for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

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

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold,

transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

Quality Control Samples

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

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

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

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

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

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

Upon providing a Quality Control Sample to an employee, CNA Stores will record:

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



PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

CNA Stores, Inc. (“CNA Stores”) will securely maintain personnel records, including registration status and background check records. CNA Stores will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

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

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

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

Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for CNA Stores will undergo a detailed background investigation prior to being granted access to a CNA Stores facility or beginning work duties.

- Background checks will be conducted on all agents in their capacity as employees or volunteers for CNA Stores pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, CNA Stores will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, CNA Stores will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, CNA Stores will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time

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

- x. Any other relevant information, including information submitted by the subject.
- c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.
 - All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
 - Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
 - References provided by the agent will be verified at the time of hire.
 - As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by CNA Stores or the Commission.

Personnel Policies and Training

As outlined in CNA Stores' Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All CNA Stores agents are required to complete training as detailed in CNA Stores' Qualifications and Training plan which includes but is not limited to CNA Stores' strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

CNA Stores will have a policy for the immediate dismissal of any dispensary agent who has:

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



RECORDKEEPING PROCEDURES

General Overview

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

Recordkeeping

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

- **Corporate Records**

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

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- Business Records
Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products;
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over CNA Stores.
- Personnel Records
At a minimum, Personnel Records will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with CNA Stores and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - CNA Stores will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records

- CNA Stores will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Sales Records for Marijuana Retailer
 - CNA Stores will maintain records that it has performed a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate the sales data and produce such records on request to the Commission.
- Incident Reporting Records
 - Within ten (10) calendar days, CNA Stores will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by CNA Stores for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within CNA Stores' jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, CNA Stores will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two CNA Stores agents present during the disposal or other handling, with their signatures. CNA Stores will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a

request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.

- Recordings shall not be destroyed or altered and shall be retained as long as necessary if CNA Stores is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - CNA Stores will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
 - Records that any and all of CNA Stores' vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - CNA Stores shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event CNA Stores closes, all records will be kept for at least two (2) years at CNA Stores' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, CNA Stores will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

Policies and Procedures related to CNA Stores' operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of CNA Stores' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);

- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to CNA Stores operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of CNA Stores, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on CNA Stores' website.
- Policies and procedures for the handling of cash on CNA Stores premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

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

Record-Retention

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



MAINTAINING OF FINANCIAL RECORDS

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

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over CNA Stores.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If CNA Stores determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.

- Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.
- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission’s regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission’s regulations.
 - License Renewal Records
 - CNA Stores shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city’s or town’s anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.



QUALIFICATIONS AND TRAINING

CNA Stores, Inc. (“CNA Stores”) will ensure that all employees hired to work at a CNA Stores facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner. CNA Stores will maintain a list of anticipated positions and their qualifications.

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of CNA Stores’ agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A CNA Stores Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

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

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

Basic Core Curriculum

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

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

CNA Stores will encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. CNA Stores’ records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

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



ENERGY COMPLIANCE PLAN

CNA Stores, Inc. (“CNA Stores”) is currently exploring potential energy-use reduction opportunities such as natural lighting and energy efficiency measures and a plan for implementation of such opportunities. CNA Stores will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

Potential Energy-Use Reduction Opportunities

CNA Stores is considering the following potential opportunities for energy-use reduction and plans for implementation of such opportunities.

1. Natural Lighting;
2. Energy efficient exterior wall construction, which may include batt insulation, continuous rigid insulation, and air and vapor barriers; and
3. Plumbing fixtures that are Water Sense rated for reduced water consumption.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, CNA Stores will continue to evaluate energy-use reduction opportunities.

Renewable Energy Generation Opportunities

CNA Stores is in the process of considering opportunities for renewable energy generation (including wind and solar options). CNA Stores’ preliminary examination of renewable energy generation has determined that the upfront costs of such options are too expensive at this time, although CNA Stores may reconsider at a future date. CNA Stores will also consult with its architects and engineers when designing the facility to determine the building’s capacity for renewable energy options (e.g. whether or not the roof can support the weight of solar panels). Nevertheless, our team is dedicated to consistently strive for sustainability and emissions reduction.

Strategies to Reduce Electric Demand

CNA Stores is considering the following strategies to reduce electric demand:

1. Exterior and interior glazing on windows such that maximum natural daylight can enter the building without compromising security, reducing the reliance on artificial light during daytime hours;
2. Lighting fixtures that are energy efficient and used with Energy Star rated bulbs; and
3. Room lighting and switching will have occupancy sensors to reduce electrical consumption when rooms are unoccupied.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, CNA Stores will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

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



PRODUCT MANUFACTURING SAFETY PLAN

Agent Hygiene Practices

CNA Stores agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All CNA Stores agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the CNA Stores facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All CNA Stores agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

Food Material Practices

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

Food Contact Surface Sanitation Practices

The Company recognizes the importance of properly washing, rinsing, and sanitizing food preparation equipment, utensils, and all surfaces that come into contact with food to reduce the number of bacteria, prevent the spread of bacteria, and eliminate the possibility of cross-contamination. CNA Stores will institute the following sanitation procedures in its commercial kitchen:

- Sanitizing solution should be used in the kitchen and other areas to sanitize food contact surfaces and utensils prior to use.
- All surfaces that come into contact with food will be washed, rinsed, and sanitized after each use, when an agent begins working with another type of food, anytime an agent is interrupted during a task and the tools or items they have been working with may have become contaminated, or at four-hour intervals if the areas or items are in constant use.
- Sanitizing solution will be stored in buckets or other containers such as a spray bottle and used with wiping cloths to sanitize prep tables, prep sinks, dining room tables, bar area, and working utensils; in the third compartment of a 3-compartment sink to sanitize all dishes that are washed; and use the final rinse in the dish machine to sanitize all dishes that are washed.
 - The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50-100ppm. Do not exceed 200 ppm.	Amount needed per unit of water		
	per 2 quarts	per gallon	per 12 gallons
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.
- Agents will ensure that all wiping cloths are soaked with sanitizer when cleaning food contact surfaces (like cutting boards, prep tables, slicers, etc.) and stored in sanitizer when not in use.
- Sanitizer buckets will be set up at all times in areas where food is being handled. Agents will check sanitizer solutions frequently to ensure that they are at the correct

concentration, using the proper test strips for the type of sanitizing chemical that they are using.

- Sanitizer solutions will be changed as needed to properly sanitize food contact surfaces.
- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the CNA Stores facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.
- Equipment and utensils utilized in the CNA Stores facility be so designed and of such material and workmanship as to be adequately cleanable.

Training

All agents will complete mandatory safety training sessions. CNA Stores agents and CNA Stores management will have the following responsibilities when it comes to health and safety:

- **CNA Stores Management:**
 - Ensure the health and safety of all agents.
 - Correct any workplace conditions that are hazardous to the health and safety of agents.
 - Inform agents about any remaining hazards.
 - Make copies of the OSHA Regulations and any workers compensation requirements available by posting throughout the facility.
 - Ensure agents know their rights and responsibilities under OSHA Regulations and the Commission's requirements and that they comply with them.
 - Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
 - Provide agents with education, supervision, and training specific to equipment.
 - Perform ongoing reviews and updates to policies and procedures as needed.
- **CNA Stores Agents:**
 - Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
 - Comply with all regulations and other legal requirements.
 - Follow established safe work procedures.
 - Use the required personal protective equipment.
 - Refrain from horseplay or similar conduct that may endanger others.
 - Ensure individual ability to work safely is not impaired by drugs or alcohol.
 - Report accidents and other incidents (including near misses) to the manager on duty.
 - Report the following to the manager on duty:
 - A hazard that might endanger CNA Stores agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Cleanliness & Sanitation Training:

CNA Stores will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. CNA Stores' training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.
- Quality assurance procedures and consequences of failing to follow the company's established processes; and
- ServSafe certification training.

CNA Stores Lab and Production Agent Health and Safety Program

CNA Stores has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the CNA Stores facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the CNA Stores facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

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

Workplace Safety Procedures

CNA Stores has developed policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards

1. Each employee must comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to 29 U.S.C. § 651, et seq., which are applicable to the employee's own actions and conduct. All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928 and 1977 are incorporated by reference, and applicable to all places of employment covered by 935 CMR 500.000. All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928, and 1977 are incorporated by reference.
2. OSHA Standards that may be applicable are:
 - a. 1904 Recording and reporting occupational injuries and illnesses
 - b. 1910.36 Design and construction requirements for exit routes
 - c. 1910.38 Emergency action plans
 - d. 1910.39 Fire prevention plans
 - e. 1910.94 Ventilation
 - f. 1910.95 Occupational noise exposure
 - g. 1910.101 Compressed gases
 - h. 1910.106 Flammable Liquids
 - i. 1910.120 Hazardous waste operations and emergency response
 - j. 1910.132 Personal protective equipment: general requirements
 - k. 1910.133 Eye and face protection
 - l. 1910.134 Respiratory protection
 - m. 1910.135 Head protection
 - n. 1910.136 Foot protection
 - o. 1910.137 Electrical protective equipment
 - p. 1910.138 Hand protection
 - q. 1910.141 Sanitation
 - r. 1910.147 The control of hazardous energy (lockout/tagout)
 - s. 1910.151 Medical services and first aid
 - t. 1910.157 Portable fire extinguishers
 - u. 1910.159 Automatic sprinkler systems
 - v. 1910.165 Employee alarm systems
 - w. 1910.212 Machinery and machine guarding
 - x. 1910.242 Hand and portable powered tools and equipment

- y. 1910.263 Bakery equipment
- z. 1910.303 General design standards for electrical systems
- aa. 1910.335 Safeguards for personnel protection and electrical systems
- bb. 1910.1000 Table Z-1 Table Z-1 Limits for Air Contaminants
- cc. 1910.1200 Hazard communication

Hazard Communications Plan

1. CNA Stores' Hazard Communication policies and procedures shall ensure CNA Stores is compliant with applicable OSHA requirements and all applicable state and local laws, regulations, ordinances, and other requirements.
2. All levels of supervision will be held accountable for the safety of those employees under their direction.
3. Copies of CNA Stores' Hazard Communication policies and procedures shall be given to all employees and be available for all to review, upon request.
4. CNA Stores' Hazard Communication policies and procedures shall, at a minimum, address the following:
 - a. Informing employees of hazardous chemicals used at CNA Stores.
 - b. Use of labels and other forms of warning. Use of Material Safety Data Sheets (MSDS).
 - c. Procedure with respect to hazardous non-routine tasks.
 - d. Maintaining a list of known hazardous chemicals used by employees and independent contractors.
 - e. Communication of hazards.
 - f. Training of employees and independent contractors.
5. CNA Stores Facility Manager will maintain, review, and update the Hazard Communication policies and procedures and be responsible for:
 - a. Implementation of CNA Stores' Hazard Communication policies and procedures.
 - b. Ensure that OSHA records are maintained at all times.
 - c. Train all CNA Stores employees and visiting independent contractors.
 - d. Provide documentation of all training and communications to the Human Resources Manager.

Personal Protective Equipment (PPE)

1. CNA Stores' personal protective equipment (PPE) policies and procedures have been developed to identify work situations that require the use of PPE and to determine the proper selection and use of PPE.
2. PPE will be selected and used to protect employees from the hazards and potential hazards that they are likely to encounter.
3. Employees will wear appropriate PPE at all times.
4. All managers, will implement all aspects of CNA Stores' PPE policies and procedures, including:
 - a. Understanding of the applicable federal, state and local laws, regulations, ordinances, and other requirements, as well as best practice safety standards.
 - b. Reviewing hazard assessments to determine the need for PPE.
 - c. Acquiring the correct PPE.
 - d. Training employees on the use of PPE.

- e. In coordination with the Human Resources Manager, documenting and maintaining employee PPE training.
- f. Ensuring PPE is available, provided and documented.
- g. Conducting hazard specific training for the use of PPE.
- h. Establishing inspections, maintenance and replacement procedures to make sure damaged PPE is not used.

All Managers will:

1. Ensure all employees wear the appropriate PPE.
2. Ensure that all employees have completed PPE training.
3. Contact the Chief Operating Officer when a hazard or process has changed which may render previously used PPE ineffective.
4. Comply with PPE policies as required and support the PPE program as necessary.
5. Participate in quarterly training for the use and maintenance of PPE.
6. Replace all damaged PPE.

Employees will:

1. Inspect PPE before use and ensure proper maintenance.
2. Wear all assigned PPE and conduct assigned tasks in a safe manner.
3. Notify a manager when PPE is damaged and needs to be replaced.
4. Participate in quarterly training for the use and maintenance of PPE.
5. Comply with PPE policies as required and support the PPE program as necessary.

Assessment

1. For each hazard identified during the hazard assessment, PPE will be selected to protect the employee by creating a barrier against the workplace hazard.
2. PPE will be selected to protect against any hazard that is present or likely to be present.
3. PPE selections will be compliant with all applicable federal (excepting federal laws related to marijuana), state and local laws, regulations, ordinances, and other requirements.
4. All managers will choose PPE based on characteristics such as design, reliability, and suitability for the hazardous task.
5. Managers will ensure the PPE selected offers a level of protection greater than the minimum required to protect employees from the identified hazards.
6. Upgraded PPE will be immediately provided if any change in facility status results in dangerous exposures to employees.

Fire Protection Plan

1. All CNA Stores employees, supervisors, and managers are expected to follow the procedures outlined in this plan to ensure that employees and consumers are protected.
2. The Facility Manager is responsible for the control of accumulation of flammable or combustible waste materials.
3. In addition, the Facility Manager is responsible for maintenance of equipment and systems installed to prevent or control ignitions of fires (ex. Fire Extinguishers, fire hoses, etc.)

4. All CNA Stores agents will be trained on and are responsible for understanding the following Safe Code of Work Practices:
 - a. Flammables, including datasheets, books, rags, clothing, flammable liquids or trash shall not be placed or stored near heaters or their vents, any electrical appliance, or other potential sources of ignition.
 - b. Sources of actual or potential heat such as hot plates or electric coffee pots shall not be placed near flammable materials. Portable space heaters and candles are prohibited.
 - c. Care must be taken not to block potential escape routes, particularly with flammable materials.
 - d. Each individual is personally responsible for assuring that extension cords and multiple plugs are in good condition. Cords that are missing the grounding prong, are spliced together, or that are missing their protective sheath shall not be used.
5. Additionally, fire control measures installed or available in work areas include installed and monitored sprinkler systems, fire extinguishers and fire alarms systems.
6. The Facility will have Fire Extinguishers throughout the facility.

Emergency Action Plan

1. CNA Stores' emergency action plan serves to outline procedures for handling of emergency situations.
2. These protocols ensure the safety of all personnel in an emergency situation.
3. The Compliance Officer will oversee policy compliance for personnel under his or her supervision. Facility managers are responsible for oversight of all the employees and all emergency procedures.
4. All CNA Stores employees will adhere to the policies and SOPs in this manual.
5. All employees will have proper training in emergency preparedness as a condition of employment.

Response to a Medical Emergency

Medical problems may range from minor, isolated events such as a fall down the stairs to the significant events involving many people. All employees will be trained in the following responses to medical emergencies:

- They should assess the situation.
- If the person is conscious, Agents should ask him or her to tell them if anything hurts. If unconscious, Agents should gently inspect the person for obvious signs of injury.
- Agents should not move the person (especially if he or she indicates any pain) unless Agents are in imminent danger of further injury, e.g., an approaching fire.
- Agents should ask someone else to call 911 if Agents are helping an injured person.
- Agents should also call the manager if he or she is not present and inform them of the situation, the location, etc.
- Agents may render first aid if Agents are knowledgeable and willing, but if possible should wait for qualified personnel to deliver medical attention.
- Agents should ask someone else to recover the first aid kit to utilize during the emergency and avoid coming in contact with blood, vomit, or other bodily fluids without the use of rubber gloves.
- Agents should not provide or administer any medicines and defer to emergency personnel

once Agents arrive.

- Agents should limit their conversation with the person to reassurances and not discuss their injury, the accident, or what circumstances might have contributed to its cause, if possible.
- After the person has been given first aid and the incident is over, Agents should provide police or other emergency personnel with any details that Agents know.
- After the medical emergency is over, the injured person, witness, and/or supervisor should formally document the incident and maintain a record of it.

Response to a Fire Emergency

- Activate nearest fire alarm (if installed)
- Notify the local fire department by calling 911
- If no fire alarm is available notify on-site personnel via:
 - Voice communication
 - Phone paging
 - Radio
- Fight the fire ONLY if:
 - The fire department has been notified
 - The fire is small and not spreading to other areas
 - Escaping the area is possible by backing up to the nearest exit
 - The fire extinguisher is in working condition and personnel are trained to use it
- Upon being notified of a fire emergency, occupants must:
 - Leave the building using designated escape routes
 - Assemble in the designated area
 - Remain outside until the competent authority (Designated Official or designee) announces that it is safe to re-enter.
- The Compliance Officer shall designate employees as emergency responders who shall:
 - Disconnect utilities and equipment unless doing so jeopardizes his/her safety
 - Coordinate an orderly evacuation of personnel
 - Perform an accurate headcount of personnel reported to the designated area
 - Determine a rescue method to locate missing personnel
 - Provide fire department personnel with the necessary information about the facility

Extended Power Loss

In the event of an extended power loss to this facility, precautionary measures should be taken including but not limited to:

- Unnecessary electrical equipment and instruments should be turned off if power restoration causes a surge that could damage electronics and sensitive equipment.

If the power loss causes freezing temperatures within the building the following measures should be taken:

- Emergency eyewash station should be drained of water to avoid freezing and cracking of pipes.
- Equipment that contains fluids that can freeze due to long-term exposure should be drained of all such fluids.

- Propylene-glycol may be added to drains to prevent traps from freezing.

Upon restoration of power (and heat):

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming in circuitry.
- Water pipes should be checked for leaks after heat has been restored to prevent flooding.

Bomb Threat

In the event of a bomb threat made in person or over the phone:

- Be calm and listen,
- Do not interrupt the caller,
- Record your name, time, and date,
- Record the following about the caller's identity:
 - Sex (Male or female)
 - Adult or juvenile
 - Origin of call (local, long distance, telephone booth):
 - Voice characteristics: loud/soft, high pitch/deep, raspy/pleasant, intoxicated, other
 - Accent: local/not local, foreign/regional, race
 - Speech: fast/slow, distinct/distorted, stutter/slurred/nasal
 - Manner: calm/angry, rational/irrational, coherent/incoherent, deliberate/emotional, righteous/laughing
 - Language: excellent, good, fair, poor, foul
 - Background noises: factory, trains, machines, animals, music, quiet, office, voices, airplanes, street, party, traffic, atmosphere
- If told, record all the following facts:
 - When will it go off
 - Where is it located
 - What kind of bomb
 - What kind of package
- While on the phone or handling the person deploy the silent alarm button nearest your position.
- If the threat is made by phone, signal personnel to evacuate the facility immediately.
- As soon as possible call 911 and all company emergency contacts.

Flood

- Stay calm and await instructions from designate emergency personnel or first responders.
- Shut down all utilities and equipment if it is safe to do so.
- Follow the recommended primary or secondary evacuation routes.

Blizzard

- Stay calm and await instructions from designate emergency personnel or first responders.
- Stay indoors.
- If there is no heat:
 - Close off unneeded rooms or areas

- Stuff towels or rags in cracks under doors
- Cover windows
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, lightweight warm clothing, if available.

Armed Robbery

All employees will be trained on how to respond to an armed robbery. Agents will receive initial training as a component of onboarding, re-fresher training annually and as needed throughout the year:

- 1) If a firearm is displayed, Agents should assume it is real and loaded.
- 2) Agents should not do anything that would jeopardize their safety or the safety of others.
- 3) Agents should remain calm and not make any sudden moves. If Agents must put their hands into a pocket or make any other moves, explain the action before doing it. If the robber(s) have a weapon, they will likely use it if provoked.
- 4) Agents should activate alarms ONLY if Agents can do so safely and without detection.
- 5) Agents should follow the directions of the robber(s), but not volunteer to anything more than asked.
- 6) If the robber hands them a note, Agents should drop it on the floor or place it out of sight to retain as evidence.
- 7) Agents should study the robber(s) as carefully as possible without being obvious, noting height, weight, race, age, clothing, jewelry, sex, speech characteristics, scars, tattoos, physical characteristics, gait, and method of operation.
- 8) Agents should note the number of accomplices and where they stood, paying special attention to the way the robbers address each other because under stress, they may use real names.
- 9) Agents should note the type of weapon used by the robber and where he or she carried it.
- 10) Agents should note the direction in which the robber(s) departed and how they carried the money or cannabis away (sack, bank bag, etc.).
- 11) Agents should try to remember exactly what the robber(s) said.
- 12) Agents should prioritize their safety and the safety of others because money or cannabis can be recovered or replaced but a life cannot.

After an armed robbery, any employee can call 911 to report the robbery and provide their name and location. Agents should not leave the phone until they have answered all of the operator's questions. If injury occurred, Agents should advise the police if an ambulance is needed. The person who actually dealt with the robber(s) should be near the person designated to telephone the police to assist in answering any questions.

As soon as the robbery has been reported to the police, the employees should lock all doors, ask all witnesses to remain, and allow no one to enter until officers arrive. Agents should not touch anything. All persons who dealt with the robber or were present during the robbery should immediately begin writing all they can remember of the incident but not discuss the robbery with anyone until after Agents have given their information to the police.

Active Shooter

The U.S. Department of Homeland Security defines an active shooter as “an individual actively engaged in shooting or attempting to shoot people in a confined and populated area.” CNA Stores will teach all employees the DHS-recommended procedures of Run.Hide.Fight. if they find themselves in an area with an active shooter:

- 1) **Evacuate (RUN)**: If employees are in the building where an active shooter is present, they should look and listen for indications of where the threat is. If they see people fleeing from a particular area, they know that the threat is in that area and could be coming toward them. They can try to evacuate the building if the nearest route is away from the active shooter or move to a room that can be locked (safe room). If they cannot evacuate or move to a safe room, they should move away from the threat and away from the noise and commotion.

- 2) **Lockdown and Shelter-in-Place (HIDE)**: If they cannot safely evacuate the area, the best option is for the employees to find a room with a door that locks from the inside. If the door does not lock, they should barricade it with large heavy objects such as desks, tables, file cabinets, furniture, and books to make entry as difficult as possible. They should locate an area with ballistic cover, not just visual concealment, because cover stops and slows bullets while concealment does not. If for some reason the employees are caught in an open area such as a hallway or reception area, they can try to hide, remain as quiet and calm as possible, or “play dead” to avoid detection. Employees should also:
 - Cover windows and draw blinds
 - Turn off radios and computer monitors
 - Keep out of sight
 - Silence cell phones and remain as quiet as possible

- 3) **Confront the Shooter (FIGHT)**: If the employees come face to face with the assailant, as a last resort and because no single procedure can be recommended in this situation, they should attempt to quickly overpower the individual with force in the most violent manner possible. If the employees are with other people they should work as a collective group to overcome the shooter by yelling “Gun!”, throwing items at the shooter’s head to distract him or her, grabbing the weapon, or holding the shooter for police. They should remember that in most cases, the attacker will continue to shoot victims unless he or she is stopped.



CNA STORES, INC.

DIVERSITY PLAN

1. Overview

CNA Stores, Inc. (“CNA Stores”) is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People who identify as LGBTQ+.

To support such populations, CNA Stores has created the following Diversity Plan (the “Plan”) and has identified and created goals/programs to promote equity in CNA Stores’ operations.

2. Goals

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

1. Develop an annual mentorship program to give industry-specific training to at least four (4) individuals who identify as either a woman, minority, veteran, person with a disability, or person identifying as LGBTQ+.
2. Hire such that staff is comprised of at least 40% women; 15% minorities; 10% veterans; 5% LGBTQ+; and 5% people with disabilities.

3. Programs

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

1. Develop a Mentorship Program for individuals falling under the above-listed demographics. The Mentorship Program will support at least four (4) individuals per year, and CNA Stores will provide those individuals with a training course from the Cannabis Training University to achieve a Masters of Marijuana Certificate. Applicants for and participants in the Mentorship Program will be asked to complete a demographic survey to ensure that at least four (4) individuals from the above demographics are selected. Trainings will cover topics such as:
 - How To Grow Marijuana
 - Marijuana Cooking & Extractions
 - Marijuana Laws and Regulations
 - Marijuana Dispensary & Delivery Service Management
 - Marijuana as Medicine
 - Becoming a Budtender: Essential Skills Training
2. Host or participate in two (2) job fairs per year in Haverhill with a focus on identifying individuals falling under the above-listed demographics. Job fairs may be held virtually and will be advertised via Facebook. Job fairs will be able to accommodate no fewer than ten (10) participants.
3. Work with the City of Haverhill’s Department of Veterans’ Services to advertise employment opportunities tailored to hiring Veterans.

4. Measurements

The Chief Operations Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure CNA Stores continues to meet its commitments. Such measurable outcomes, in accordance with CNA Stores' goals and programs described above, include:

1. Documenting that staff is comprised of at least 40% women; 15% minorities; 10% veterans; 5% LGBTQ+; and 5% people with disabilities.
2. Documenting the number of open positions posted with the Department of Veterans' Services of Haverhill;
3. Documenting the number of job fairs that CNA Stores hosts or participates in in Haverhill.
4. Providing reports measuring the effectiveness of our mentoring program and number of individuals engaged in the program.

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

5. Acknowledgements

- CNA Stores will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.
- Any actions taken, or programs instituted, by CNA Stores will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.