



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR283773
Original Issued Date: 02/24/2022
Issued Date: 02/24/2022
Expiration Date: 02/24/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Cypress Tree Management Natick, Inc.

Phone Number: 617-892-8687 Email Address: jcrowford@publicpolicylaw.com

Business Address 1: 419 BOYLSTON STREET

Business Address 2: 300

Business City: Boston

Business State: MA

Business Zip Code: 02116

Mailing Address 1: 419 BOYLSTON STREET

Mailing Address 2: 300

Mailing City: Boston

Mailing State: MA

Mailing Zip Code: 02116

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

To your knowledge, is the existing RMD certificate of registration in good standing?:

yes

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 26.99

Percentage Of Control: 33.3

Role: Owner / Partner

Other Role:

First Name: Victor

Last Name: Chiang

Suffix:

Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)	
Specify Race or Ethnicity:	

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 21.18	Percentage Of Control: 33.3	
Role: Owner / Partner	Other Role:	
First Name: Todd	Last Name: Finard	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 19.92	Percentage Of Control: 33.3	
Role: Owner / Partner	Other Role:	
First Name: Eric	Last Name: Liebman	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

Entity with Direct or Indirect Authority 1

Percentage of Control:	Percentage of Ownership: 100	
Entity Legal Name: Cypress Tree Investment Group, Inc.	Entity DBA:	DBA City:
Entity Description: Domestic Business Corporation		
Foreign Subsidiary Narrative:		
Entity Phone: 617-892-8687	Entity Email: victor@westonroots.com	Entity Website:
Entity Address 1: 419 Boylston Street	Entity Address 2:	
Entity City: Boston	Entity State: MA	Entity Zip Code: 02116
Entity Mailing Address 1: 419 Boylston Street	Entity Mailing Address 2:	
Entity Mailing City: Boston	Entity Mailing State: MA	Entity Mailing Zip Code: 02116
Relationship Description: Majority owners of Cypress Tree Management Natick, Inc.		

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Cypress Tree Management Group, Inc.	Entity DBA:		
Email: victor@westonroots.com	Phone: 617-892-8687		
Address 1: 419 Boylston Street	Address 2: 300		
City: Boston	State: MA	Zip Code: 02116	
Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of Capital Provided: \$500000	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: Victor Last Name: Chiang Suffix:
Marijuana Establishment Name: Cypress Tree Management, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Newton Marijuana Establishment State: MA

Individual 2

First Name: Todd Last Name: Finard Suffix:
Marijuana Establishment Name: Cypress Tree Management, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Newton Marijuana Establishment State: MA

Individual 3

First Name: Eric Last Name: Liebman Suffix:
Marijuana Establishment Name: Cypress Tree Management, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Newton Marijuana Establishment State: MA

Individual 4

First Name: Victor Last Name: Chiang Suffix:
Marijuana Establishment Name: Cypress Tree Management Fenway, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Boston Marijuana Establishment State: MA

Individual 5

First Name: Todd Last Name: Finard Suffix:
Marijuana Establishment Name: Cypress Tree Management Fenway, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Boston Marijuana Establishment State: MA

Individual 6

First Name: Eric Last Name: Liebman Suffix:
Marijuana Establishment Name: Cypress Tree Management Fenway, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Boston Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 321 Speen Street

Establishment Address 2:

Establishment City: Natick Establishment Zip Code: 01760

Approximate square footage of the establishment: 5000 How many abutters does this property have?: 232

Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning 9.18.20.pdf	pdf	6078863b3a37ef458c086a21	04/15/2021

Community Outreach Meeting Documentation	CT7C08~1.PDF	pdf	6079be374989114597238152	04/16/2021
Certification of Host Community Agreement	CTM Natick HCA Certification Executed 3.24.21.pdf	pdf	608315b78f80610756a0f8e0	04/23/2021

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	CTM Revised Positive Impact Plan.pdf	pdf	607870a886f403457678d46e	04/15/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role:
 First Name: Victor Last Name: Chiang Suffix:
 RMD Association: RMD Owner
 Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role:
 First Name: Todd Last Name: Finard Suffix:
 RMD Association: RMD Owner
 Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role:
 First Name: Eric Last Name: Liebman Suffix:
 RMD Association: RMD Owner
 Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company Other Role:
 Entity Legal Name: Cypress Tree Investment Group, Inc. Entity DBA:
 Entity Description: Domestic Business Corporation
 Phone: 617-549-2945 Email: victor@westonroots.com
 Primary Business Address 1: 419 Boylston Street Primary Business Address 2: 300
 Primary Business City: Boston Primary Business State: MA Principal Business Zip Code: 02116

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	CTM Natick DUA Attestation.pdf	pdf	607879952e84db44a04c84de	04/15/2021
Department of Revenue - Certificate of Good standing	CTM Natick DoR Certificate of Good Standing (04.13.21).pdf	pdf	6078799b21aec245a96cb415	04/15/2021
Articles of Organization	CTMN Articles of Domestication.pdf	pdf	607879b7a6d53445a21e4b42	04/15/2021
Bylaws	Bylaws - Cypress Tree Management Natick, Inc.[11861281v1].pdf	pdf	607879c286f403457678d4a8	04/15/2021
Secretary of Commonwealth - Certificate of Good Standing	CTMN SOS Cert of Good Standing.pdf	pdf	607879febd015444c55046ef	04/15/2021

No documents uploaded

Massachusetts Business Identification Number: 001462573

Doing-Business-As Name: Redi

DBA Registration City: Natick

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	CTMN Liability Insurance Plan.pdf	pdf	60787a0e59973545607657db	04/15/2021
Proposed Timeline	CTMN Proposed Timeline Retail Natick.pdf	pdf	6078866d8bb25444af3011b8	04/15/2021
Business Plan	CTM Natick Business Plan RFI 1.pdf	pdf	6083189ae067a90777b4d4e2	04/23/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Dispensing procedures	CTMN Dispensing Procedures Natick.pdf	pdf	60787c1e8d8557457dbb8ece	04/15/2021
Energy Compliance Plan	CTMN Energy Compliance Plan Natick.pdf	pdf	60787c1fcefab844e6714c52	04/15/2021
Inventory procedures	CTMN Inventory procedures Natick.pdf	pdf	60787c20a6d53445a21e4b5a	04/15/2021
Maintaining of financial records	CTMN Maintaining of Financial Records.pdf	pdf	60787c218bb25444af301140	04/15/2021
Personnel policies including background checks	CTMN Personnel Policies Natick.pdf	pdf	60787c4ca6d53445a21e4b60	04/15/2021
Plan for obtaining marijuana or marijuana products	CTMN Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	60787c4d8bb25444af301146	04/15/2021
Restricting Access to age 21 and older	CTMN Policy for Limiting Access to Age 21 and Older.pdf	pdf	60787c4e4989114597237d2f	04/15/2021
Prevention of diversion	CTMN Prevention of Diversion.pdf	pdf	60787c502e84db44a04c84f9	04/15/2021

Quality control and testing	CTMN Procedures for Quality Control and Testing.pdf	pdf	60787c76cefab844e6714c58	04/15/2021
Qualifications and training	CTMN Qualifications and Training.pdf	pdf	60787c77a6d53445a21e4b64	04/15/2021
Record Keeping procedures	CTMN Record Keeping Procedure.pdf	pdf	60787c78518b4d4499417402	04/15/2021
Security plan	CTMN Security Plan.pdf	pdf	60787c7921aec245a96cb444	04/15/2021
Separating recreational from medical operations, if applicable	CTMN Separating Recreational from Medical Operations.pdf	pdf	60787c944989114597237d35	04/15/2021
Storage of marijuana	CTMN Storage of Marijuana Natick.pdf	pdf	60787c952e84db44a04c84fd	04/15/2021
Transportation of marijuana	CTMN Transportation of Marijuana Natick.pdf	pdf	60787c969cefd04567d4e4e7	04/15/2021
Diversity plan	CTM Revised Diversity Plan.pdf	pdf	60787cb159973545607657f7	04/15/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 9:00 AM Monday To: 10:00 PM

Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 10:00 PM
Saturday From: 9:00 AM	Saturday To: 10:00 PM
Sunday From: 12:00 PM	Sunday To: 5:00 PM

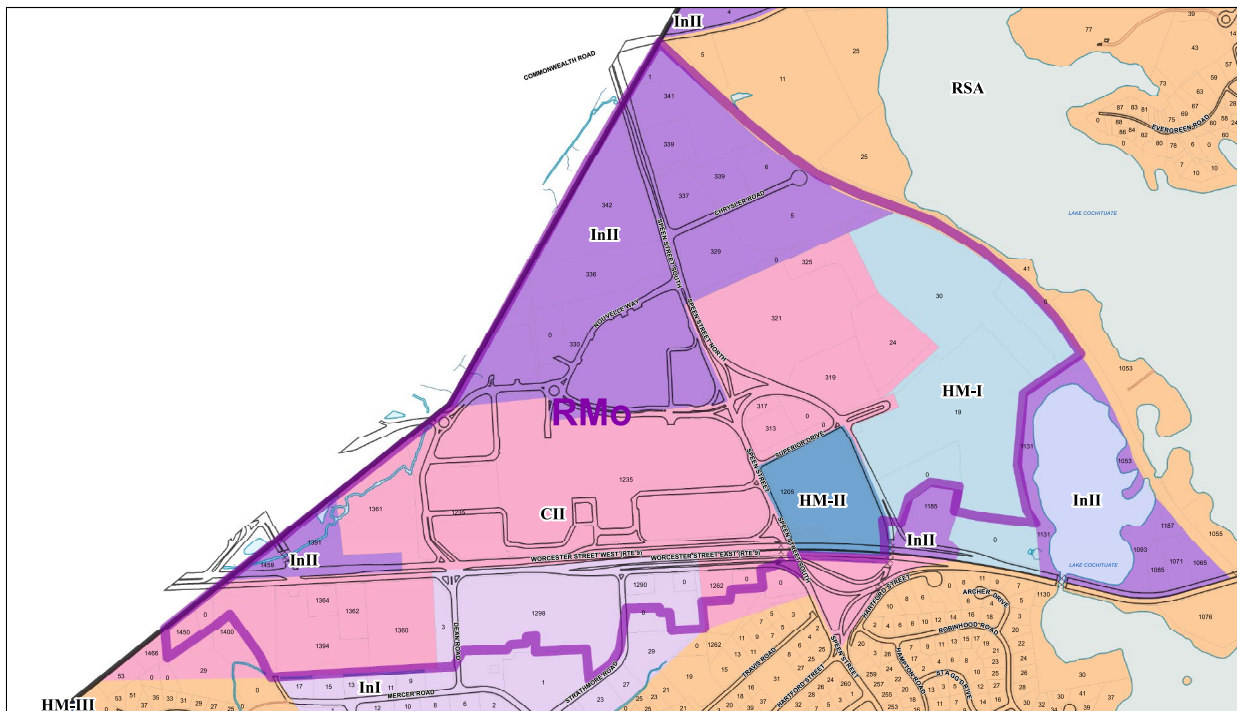
Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Cypress Tree Management Natick, Inc. (“Cypress”) is and will remain in compliance with local codes, ordinances and bylaws for the physical address of the marijuana establishment at 321 Speen Street, Natick MA 01760, Natick, MA which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

321 Speen Street is located in the Retail Marijuana Overlay (Rmo) Zoning District and properly zoned pursuant to the Town of Natick Zoning Bylaw. In accordance with Section 5.3 Cypress is not located within a building containing residential units, including transient housing and group housing. Pursuant to Section 5.4 Cypress is not located within 500 feet of another Marijuana Retailer. This distance was measured by a straight line from the nearest point of the building in question.

Pursuant to Section 6 Cypress will not allow the escape of odors or gases from the storage of marijuana or marijuana products. Cypress will incorporate odor control technology, to the extent necessary, to ensure that emissions do not violate M.G.L c. 111, s. 31 C. In accordance with Section 6.2 all Cypress signage will comply with the requirements of 935 CMR 500, and Section V of the Zoning Bylaw.

In addition to Cypress remaining compliant with existing Zoning Bylaw; Cypress will continuously engage with Town of Natick officials to remain up to date with local zoning bylaws to remain fully compliant.



Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 4/12/21
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:

3/26/21

b. Name of publication:

Metro West
Daily 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:

3/22/21

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:

4/2/21

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



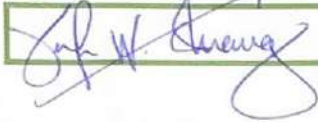
Name of applicant:

Cypress Tree Management Natick, Inc.

Name of applicant's authorized representative:

Victor Chiang

Signature of applicant's authorized representative:





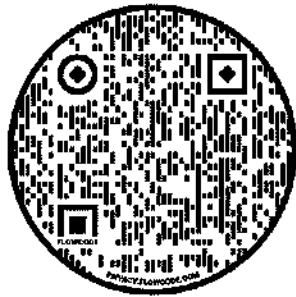
Cypress Tree Management Natick

Attachment B

Notice is hereby given that a Virtual Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, April 12th, at 6:00 PM. The Virtual Community Outreach Meeting will be available at the following link and phone number. For those viewing this notice in print, please find meeting link on metrowestdailynews.com which will bring you directly to the meeting.

Link: **Zoom** <https://us02web.zoom.us/j/82756368932>

Meeting ID: 827 5636 8932



QR Code: **Zoom**

Phone Number: **Zoom** +13126266799,,82756368932# US (Chicago)

+16465588656,,82756368932# US (New York)

RECEIVED
TOWN CLERK-NATICK
MAY 22 AM 10:41

The proposed retail marijuana establishment is anticipated to be located at 321 Speen Street, Natick, MA 01760. There will be an opportunity for the public to ask questions.

Please feel free to submit your questions to info@tryredi.com in advance of this meeting.



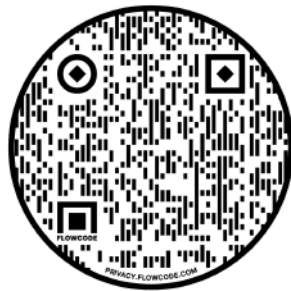
Cypress Tree Management Natick

Attachment C

Notice is hereby given that a Virtual Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, April 12th, at 6:00 PM. The Virtual Community Outreach Meeting will be available at the following link and phone number. For those viewing this notice in print, please find meeting link on metrowestdailynews.com which will bring you directly to the meeting.

Link: **Zoom** <https://us02web.zoom.us/j/82756368932>

Meeting ID: 827 5636 8932



QR Code: **Zoom**

Phone Number: **Zoom** +13126266799,,82756368932# US (Chicago)

+16465588656,,82756368932# US (New York)

The proposed retail marijuana establishment is anticipated to be located at 321 Speen Street, Natick, MA 01760. There will be an opportunity for the public to ask questions.

Please feel free to submit your questions to info@tryredi.com in advance of this meeting.

1, Costello
awford
icy Law Group.

et, Suite 1500
2109

FIRST-CLASS



US POSTAGE

02 7H
0001292446 APR 02 2021
MAILED FROM ZIP CODE 02109

\$ 000.51⁰

CTM Natick Abutters Map

**Property Information**

Property ID 17-0000004C
Location 321 SPEEN ST
Owner of Record ELSON CLOVERLEAF
LMTD PRT
**Current Owner (After
January 1)** ELSON CLOVERLEAF
LMTD PRT

**MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT**

Town of Natick, MA makes no claims and no warranties,
expressed or implied, concerning the validity or accuracy of
the GIS data presented on this map.

Geometry updated 7/1/2020
Data updated 11/19/2020

ID	Site Address	Owner Name	Owner Address
16-00000002	330 SPEEN ST		
16-00000002	330 SPEEN ST		
16-0000002B	336 SPEEN ST		
16-0000004D	329 SPEEN ST		
16-00000002	40 141N NOUVELLE WAY		
16-00000002	40 143N NOUVELLE WAY		
16-00000002	40 145N NOUVELLE WAY		
16-00000002	40 147N NOUVELLE WAY		
16-00000002	2 NOUVELLE WAY		
16-00000002	10 205S NOUVELLE WAY		
16-00000002	10 207S NOUVELLE WAY		
16-00000002	10 209S NOUVELLE WAY		
16-00000002	10 211S NOUVELLE WAY		
16-00000002	10 213S NOUVELLE WAY		
16-00000002	40 241N NOUVELLE WAY		
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16-00000002	40 245N NOUVELLE WAY		
16-00000002	40 247N NOUVELLE WAY		
16-00000002	40 249N NOUVELLE WAY		
16-00000002	40 251N NOUVELLE WAY		
16-00000002	330 SPEEN ST		
16-00000002	10 301S NOUVELLE WAY		
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March 22, 2021

James Freas, AICP
Director, Community & Economic Development
Town of Natick

Mr. Freas,

On April 27, 2020, the CCC issued an administrative order allowing virtually community outreach meetings in order to comply with the Governor's emergency order. There are thirteen necessary requirements to host a virtual community outreach meeting. Per this administrative order applicants must obtain approval in writing from the Contracting Authority or Authorized Representative of the host community for a virtual Community Outreach Meeting.

Cypress Tree Management is formally requesting your approval to host a community outreach meeting via a virtual platform. The virtual community outreach meeting will comply with all Cannabis Control Commission requirements including the public notices and the ability for community members to participate in a questions and answers interaction.

We kindly ask you to approve this request to host a virtual community outreach meeting in order to comply with Governor Baker's COVID-19 orders.

Sincerely,



Jonathan Capano, Esq.



Town of Natick, Massachusetts
Department of Community and Economic Development
13 East Central Street Natick, Massachusetts 01760

Telephone
(508) 647-6450
www.natickma.org

James Freas, AICP
Director

Revolutionary Clinics
c/o Jonathan Capano
One State St, Suite 1500
Boston, MA 02109
BY EMAIL

Dear Mr. Capano:

By this letter, the Town of Natick is granting Cypress Tree Management the ability to host a community outreach meeting via a virtual platform consistent with the Cannabis Control Commission Administrative Order No. 2 Administrative Order Allowing Virtual Web-Based Community Outreach Meetings. Cypress Tree Management must provide notice to the Town of this meeting through James Freas, acting as the Town's representative and send the notice to the Town Clerk for posting this meeting on its community events calendar on the Town of Natick website.

Sincerely,

James Freas
Director, Community & Economic Development

Marijuana - Related Uses

The Town regulates marijuana-related uses differently depending on the nature of the use. Medical marijuana establishments are governed by Section III.323.8 of the Zoning Bylaw. All other marijuana related uses, including adult-use or recreational marijuana, are governed by Section III.K of the Zoning Bylaw. Adult-use marijuana establishments must also obtain a license from the Board of Selectmen. The State also regulates all marijuana-related uses through the Cannabis Control Commission and all such uses must obtain a Host Community Agreement with the Town as a first step before applying for any other local permit.

The adopted zoning and general bylaws as well as the Adult-Use Marijuana Establishments licensing regulations are provided below for reference.

Natick Marijuana Establishments Request for Information (RFI)

The first step for any marijuana-related business interested in operating in Natick is to negotiate a Host Community Agreement with the Town. In order to enter into such negotiations, an applicant must submit a response to Natick's Marijuana Establishments Request for Information (RFI), which triggers review of a potential application by multiple Town Departments. For most marijuana establishments, the Town accepts RFI responses on a rolling basis, but for adult-use marijuana establishments, of which only two are allowed in the Town at this time, the submission deadline was June 8, 2020. The RFI, which includes descriptions of all the required submittal materials, may be downloaded from here [/DocumentCenter/View/9277/Natick-Marijuana-Establishments-RFI](#).

Natick Adult-Use Marijuana Retailer Applicants

On February 10, 2021 the Natick Select Board adopted guidelines for the top-ranked retail marijuana establishments from the RFI review process to submit supplemental materials to inform their selection process. At the same meeting, the Select Board voted to advance the Cypress Tree proposal to the Host Community Agreement negotiation phase.

- March, 2021 – Community Outreach Meetings, as described below
- March 31, 2021 – Deadline to submit supplemental materials
- April, 2021 – Staff Review
- May, 2021 – Presentations to the Select Board

Community Outreach Meetings

Natick's Marijuana Establishments RFI requires that all marijuana establishments seeking a Host Community Agreement with the Town must first complete a community outreach meeting. The following list is of upcoming Community Outreach Meetings.

Natick	Location	Type	Meeting	Announcement	Presentation
C3	42 Worcester Street	Retailer	March 22, 2021	Meeting Info	Presentation
Revolutionary Clinics	61 Worcester Street	Retailer	March 23, 2021	Meeting Info	Presentation
ReLeaf Alternatives	291 Worcester Street	Retailer	March 25, 2021	Meeting Info	Presentation
					Select Language ▼

Revolutionary Clinics	6 Worcester Street	Retailer	March 29, 2021	Meeting Info	Presentation
Cypresss Tree	321 Speen Street	Retailer	April 12, 2021		Presentation

This page will be updated on a regular basis as the local regulatory approval process continues over the next several months. Please email James Freas, Director of Community & Economic Development (jfreas@natickma.org) with any questions or comments.

Background

In 2016, over 54% of Natick residents voted in favor of legalizing adult use ("recreational") marijuana in Massachusetts. Since that vote, the Commonwealth established regulations and a governing entity (known as the Cannabis Control Commission (CCC)) to license marijuana establishments in the State.

In October 2018, Natick Town Meeting voted to 1) create the local zoning necessary to permit Adult Use Marijuana Establishments, and 2) authorize the Board of Selectmen to issue licenses for Adult Use Marijuana Establishments. Town Meeting limited the number of Retail Marijuana Establishments to two (2) – or “limited to twenty percent (20%) of the number of licenses issued within the Town for the retail sale of alcoholic beverages not to be drunk on the premises where sold pursuant to G.L. c.138 §15”.

In March 2020, the Board of Selectmen adopted regulations for the licensing of adult-use marijuana establishments and released the Marijuana Establishments Request for Information.

Related Documents

- [CED RMO West Map 2019](#)
- [CED RMO Central Map 2019](#)
- [CED RMO East Map 2019](#)
- [CED IMO Oak St Map 2019](#)
- [Adult Use Marijuana Zoning Amendment Regulations Town Meeting FINAL VOTE Motions B-F](#)
- [Adult Use Marijuana Zoning Amendment Regulations Town Meeting FINAL VOTE Motion A](#)
- [Adult Use Marijuana General Bylaw Amendment Licensing FINAL VOTE](#)
- [CCC Regulations on Adult Use Regulations](#)
- [Marijuana Powerpoint for Community Forum](#)
- [Recreational Marijuana Forum Presentation](#)

Quick Links

- [Cannabis Control Commission](#)

[View All](#)



Cypress Tree Management Natick

Cypress Tree Management Natick, Inc.

Virtual Community Meeting

April 12, 2021

Participants: 10

Link:

<https://drive.google.com/file/d/1MiRe11lp80ziJJWgLE058zLeUQL1pjzq/view?usp=sharing>

Subject: Cypress Tree Virtual Community Meeting Recording
Date: Tuesday, April 13, 2021 at 9:27:56 AM Eastern Daylight Time
From: Jonathan Capano
To: James Freas
CC: Victor Chiang
Attachments: CTM Natick VCOM Link 4.13.21.docx

Morning James,

Attached please find a link to the Cypress Tree Management Natick, Inc., Virtual Community Outreach Meeting recording. Per CCC guidelines we are required to share a copy of the recording with the host community.

Please let me know if you have any questions or if additional information is required.

Jonathan Capano, Esq.

Associate

Smith, Costello & Crawford

Public Policy Law Group.

One State Street, 15th Floor

Boston, MA 02109

O: 617-523-0600

C: 781-443-2227

www.publicpolicylaw.com

IMPORTANT

This email and any attached documents are confidential; intended only for the named recipient(s) and may contain information that is privileged or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that distribution, dissemination or copying this message is strictly prohibited. If you receive this message in error, or are not the intended recipient, please notify the sender at the email address above and delete this email from your computer.



Cypress Tree Management Natick

Natick Community Meeting

April 12, 2021

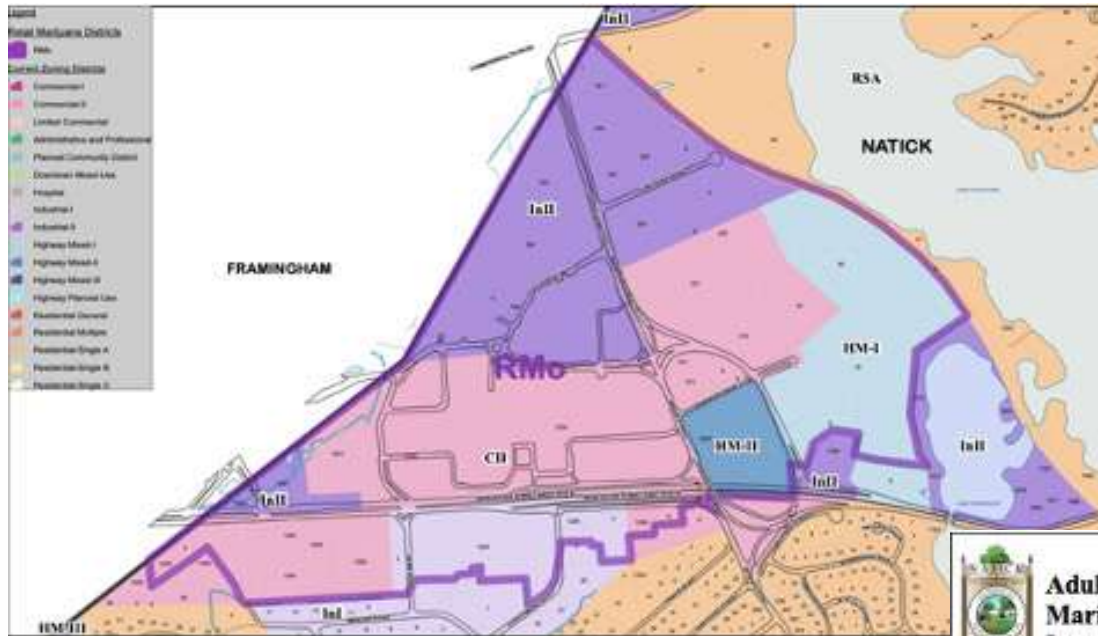


- ❑ Cypress Tree Management Natick (“CTM”) is founded and led by local childhood friends Victor Chiang, Todd Finard and Eric Liebman
- ❑ Our group is **locally owned** – we have no relationship with any national cannabis company or any other MA cannabis license holder
- ❑ We have a long **history of running local businesses**



Cypress Tree Management Natick

Project Proposal Adult Use Cannabis Establishment @ 321 Speen St



Zoning District:

- ❑ Retail Marijuana Overlay – Golden Triangle

321 Speen Street – Cloverleaf Mall

- ❑ Lot Size:
 - ❖ Approximately 565,801 sf
- ❑ Total Retail Space
 - ❖ Approximately 5,200 sf





Marijuana Retailer (Special Permit Applicant)

Buffer Zones (Full Compliance)

- ❑ Not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any grades 1 through 12
- ❑ Not located within 500 feet of any existing or proposed marijuana retailer



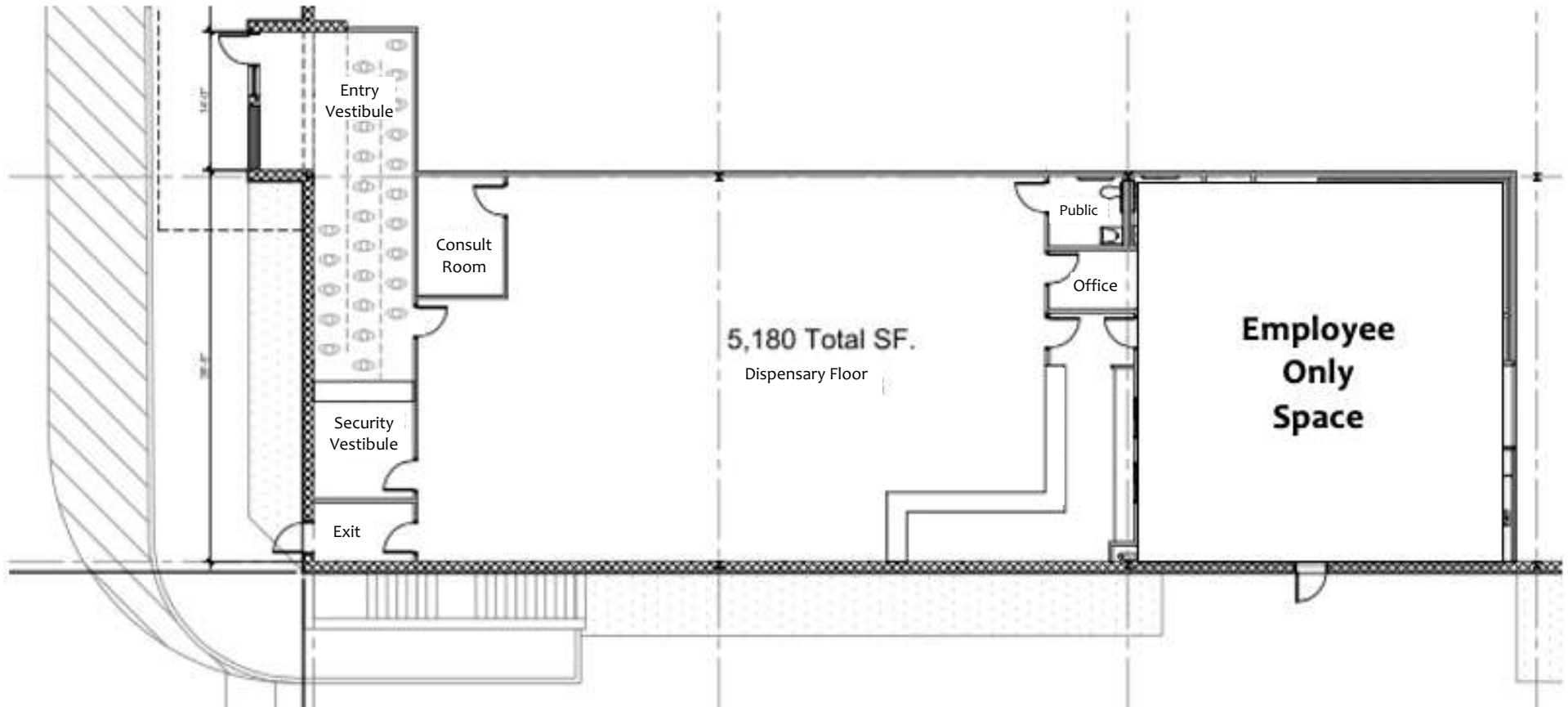
Cypress Tree Management Natick

Our Proposal





Our Proposal



We believe in wellness, education and responsibility

Our retail experience is centered around educating our customers on the product, dosing, safe consumption and storage

Education

- ❑ In-store consultations
- ❑ Zoom or virtual consultations
- ❑ Guest speakers from wellness, health, cannabis, and medical community

Outreach

- ❑ Off-site educational programs at Senior Centers, support groups, relevant community locations and events, as well as organized CTM events

Additional Opportunities

- ❑ Partnership opportunities with local vendors
- ❑ Redi Community Giveback for local charitable events and fundraisers



CTM's Security Plan will ensure that the premises is safe and protected for all patients, caregivers, staff, visitors, and the general public.



CTM has engaged New Era Technology to design, implement and monitor the security system.



Pursuant to 935 CMR 500.110(1)(a)-(o), CTM will implement sufficient safety measures to prevent unauthorized entrance into the CTM facility and theft of marijuana from occurring.



In accordance with 935 CMR 500.110(5), CTM will have a security system to prevent and detect diversion, theft or loss of marijuana product.



Pursuant to 935 CMR 500.110(5)(a)-(f), CTM's security system shall include, but is not limited to: perimeter alarms; failure notification system; duress alarm; video cameras in all areas containing marijuana; 24-hour recordings that are retained for at least 90 days, contain a date and time stamp and can be exported as still images; and the ability to remain operational during power outages.



Additionally, we will have a back up call monitoring center and a generator if we lose power.



Access to said systems will be limited to personnel essential to security operations, law enforcement, the security company and the Commission. All equipment shall be in good working order at all times.



Our security will perform routine security perimeter checks to insure that there is no loitering or consumption on site and also to prevent the illegal double parking of cars

- ❑ Pursuant to 935 CMR 500.110, CTM's security protocols will implement sufficient safety measures to prevent unauthorized entry and the theft of marijuana from occurring by:
 - ❖ Confirm the potential customer's age as twenty-one (21) or older prior to entering the facility's waiting room and show room. (935 CMR 500.110 (1)(a)).
 - ❖ Implementing the latest technologies to confirm the validity of identification cards or other documentation to prevent unauthorized access, prevent pass backs, and notify security personnel if the ID was previously scanned before and/or if it is on a banned list.
 - ❖ Utilize technology from IDScan for all customer ID verification.

- ❑ We have a proven track record of being a good corporate citizen in Natick and will build upon this
 - ❖ Rt. 9/27 Plaza Redevelopment and MassDOT intersection improvement
 - ❖ Natick Mall / Flutie Pass
- ❑ Find opportunities to help other local small business and community charities
 - ❖ Cross promotional events
 - ❖ Create our Redi Community Give Back Fund
- ❑ Accountability and access to ownership and senior executives for Natick community members

EXHIBIT A



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:

Cypress Tree Management Natick, Inc.

2. Name of applicant's authorized representative:

Victor Chiang

3. Signature of applicant's authorized representative:

Victor Chiang

4. Name of municipality:

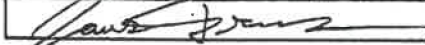
Natick

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

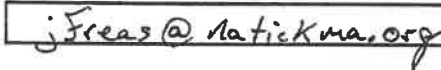
James Treas



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).):



8. Host community agreement execution date:





CYPRESS TREE MANAGEMENT POSITIVE IMPACT PLAN

Cypress Tree Management's Positive Impact Plan is intended to outline how we will fulfill the requirement to positively impact a disproportionately impacted population. We will focus on initiative on disproportionately impacted areas of Boston, including but not limited to the Washington Street area of Roxbury and the Blue Hill Avenue area of Mattapan.

Intent

Cannabis prohibition has had a disproportionate impact on various communities. As the industry begins in earnest in Massachusetts, it is fully recognized that Cypress Tree Management has a responsibility to ensure it is contributing to its community. While Cypress Tree Management is not currently siting a marijuana dispensary in a disproportionately impacted area we do have connections with impacted areas within Boston and are committed to making a positive contribution to disproportionately impacted communities in and around Boston, including but not limited to:

- The Washington Street area of Roxbury (Census Tract 817)
- The Blue Hill Avenue area of Mattapan (Census Tract 1011.01 and Census Tract 1011.02)

These areas were identified because one of the partners of Cypress Tree Management is an active community member and property owner in the Roxbury and Mattapan communities. Cypress Tree will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, branding, marketing, and sponsorship practices of our marijuana establishment. Furthermore, any actions taken, or program instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Purpose

The intent of this document is to summarize Cypress Tree Management's plan to ensure the business creates positive and lasting impacts on the targeted areas of Roxbury, Mattapan and identified areas of disproportionate impact in Boston.

Cypress Tree Management's Positive Impact Plan is meant to be a living document designed to promote strategies as our company grows, guide decisions and practices that continue to have positive impact disproportionately impacted communities.

The Positive Impact Plan represents the initial approach to establish a comprehensive plan with goals and measures. The Plan will be reevaluated annually or as needed.

Goals

Cypress Tree Management's goals will be measured and tracked at all levels of the company at least annually as follows:

Goal 1: Create a cannabis mentorship program for Economic Empowerment applicants and Social Equity applicants seeking help entering the cannabis industry.

Outcome Measure: Cypress Tree Management is committed to development and running a mentorship program to assist individuals with interest in forming their own businesses within the cannabis space with a goal of assisting 5 individuals annually. This mentorship program will hold an enrollment period each year and 5 individuals will be chosen to participate. The program will be available to all individuals; however, past and present residents of identified areas of disproportionate impact, Economic Empowerment applicants, and Social Equity applicants will be granted priority in enrollment. Examples of assistance CTM and its staff can provide include business plan development training, guidance on fund raising, and assistance in navigating the municipal special permit and Cannabis Control Commission licensing processes.

Measurement Frequency and Metrics: Cypress Tree Management will measure this goal by maintaining a record of the number of mentees it has provided aid to and the kind of assistance provided. These records will be assessed annually to determine success or progress prior to our annual license renewal.

Goal 2: Attract and hire local qualified talent from areas of disproportionate impact in Roxbury, Mattapan, and/or other identified areas of disproportionate impact in Boston or individuals who have been disproportionately harmed by marijuana prohibition including those with past drug convictions with a goal of having a workforce comprised of at least 15% of individuals who meet this standard.

Outcome Measure: Cypress Tree Management will grant past or present residents of Roxbury, Mattapan, and/or other identified areas of disproportionate impact in Boston or individuals who have been disproportionately harmed by marijuana prohibition priority in its hiring process for open positions of employment. Management of Cypress Tree Management will attend community job fairs, at least one annually, in Boston with the intent of garnering employment interest and applications from past and present residents in areas of disproportionate impact. If permissible under 935 CMR 500.105(4)(b), management will post employment opportunity advertisements in Boston newspapers, and bulletin boards in local stores, places of worship, and City municipal buildings where permitted to attract a variety of local job applicant interest.

Measurement Frequency and Metrics: Cypress Tree Management will track the number of community job fairs attended in Boston, at least one annually, and the number of employees

hired that are from areas of disproportionate impact in Boston or are considered populations disproportionately impacted by marijuana prohibition with a goal of having a workforce comprised of at least 15% individuals who reside in areas of disproportionate impact in Boston or are considered populations disproportionately harmed by marijuana prohibition like individuals with past drug convictions. These records will allow Cypress Tree Management to demonstrate progress toward its goals to the Commission upon the annual renewal of its license.

Goal 3: Cypress Tree Management will make an annual contribution of at least \$5,000 to the CultivatED program which will in turn support the mission of empowering, educating, and employing individuals from various areas of disproportionate impact.

Outcome Measure: Cypress Tree Management will make a minimum annual financial contribution of \$5,000 to the CultivatED program to help promote participation in the cannabis industry by those who have been disproportionately harmed by marijuana prohibition such as those individuals from areas of disproportionate impact. CultivatED is a jails-to-jobs cannabis program that focuses on issues such as expungement, education, and employment for those harmed populations. Cypress Tree Management will provide money to CultivatED to support its mission and goal but will not offer any of its own programming through the CultivatED program. Attached, please find a letter from CultivatED acknowledging acceptance of funds from cannabis license holders.

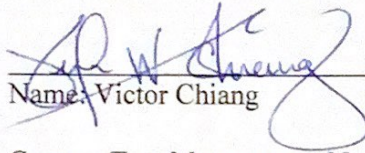
Measurement Frequency and Metrics: Cypress Tree Management will maintain a record of its annual donations to the CultivatED program. Cypress Tree Management will keep records of feedback that we receive relative to the impact of our contributions, if any. This will in turn help us make decisions about adjustments that need to be made in the future and will be used to demonstrate success or progress of our goal upon Cypress Tree Management's annual renewal, to take place one year from the date of its provisional license.

Evaluation

Cypress Tree Management will conduct continuous and regular evaluations of the implementation of our goals. We will evaluate the success of our positive impact plan through the metrics outlined above. As we gather data and information about our programs, we may retool or revisit our plan to ensure that we are meeting the goals we set out. Cypress Tree Management acknowledges that the progress or success of its plan must be documented upon renewal, one year from provisional licensure and each year thereafter.

**Department of Unemployment Assistance
Certificate of Compliance Request**

I, Victor Chiang, do hereby certify that we have been unable to register Cypress Tree Management Natick, Inc. with the Department of Unemployment Assistance and request a certificate of compliance because Cypress Tree Management Natick, Inc. does not currently have any employees. As soon as Cypress Tree Management Natick, Inc. can register with the Department of Unemployment Assistance, we will provide the Cannabis Control Commission with a Certificate of Compliance.



Name: Victor Chiang

Cypress Tree Management Natick, Inc.

Its: President

Date: April 12, 2021



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

mass.gov/dor

Letter ID: L1655886656
Notice Date: April 13, 2021
Case ID: 0-001-134-498



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



CYPRESS TREE MANAGEMENT NATICK IN
419 BOYLSTON ST STE 300
BOSTON MA 02116-3335

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, CYPRESS TREE MANAGEMENT NATICK 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

**F
FPC**

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

Articles of Domestication

FORM MUST BE TYPED

(General Laws Chapter 156D, Section 9.22; 950 CMR 113.24)

(1) Exact name of corporation in the jurisdiction of organization:

Cypress Tree Management Natick, Inc.

(2) A corporate name that satisfies the requirements of G. L. Chapter 156D, Section 4.01, if the name of the corporation is unavailable for use in the commonwealth, or the corporation desires to change its name:

(3) Jurisdiction of incorporation: Delaware

(4) Date of incorporation in foreign jurisdiction: February 20, 2019

(5) The foreign corporation ☒ is / ☐ is not * authorized to conduct business in the commonwealth.

(6) The domestication of the foreign corporation to a business corporation in the Commonwealth was duly authorized as required by the laws of the jurisdiction in which the corporation was incorporated.

(7) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon domestication is:

Cypress Tree Management Natick, Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:**

* Check the appropriate box

**Professional corporations governed by G.L. Chapter 156A and must specify the professional activities of the corporation.

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.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
		Common	5,000	\$.001

ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

See Attachment.

ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

ARTICLE VI

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

See attachment.

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

*** G.L. Chapter 156D eliminates the concept of par value, however, a corporation may specify par value in Article III. See Section 6.21 and the comments relative thereto.*

ARTICLE VII

The effective date of organization of the corporation is the date 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:

ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:
419 Boylston Street, Suite 350, Boston, MA 02116
- b. The name of its initial registered agent at its registered office:
Victor Chiang
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Victor Chiang

Treasurer: Victor Chiang

Secretary: Victor Chiang

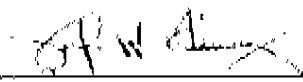
Director(s): Victor Chiang

If a professional corporation, include a list of shareholders with residential addresses and attach certificates of the appropriate regulatory board.

- d. The fiscal year end of the corporation:
12/31
- e. A brief description of the type of business in which the corporation intends to engage:
To apply for a license to operate a marijuana establishment as defined under 935 CMR 500.000.
- f. The street address of the principal office of the corporation:
419 Boylston Street, Suite 350, Boston MA 02116
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

419 Boylston Street, Suite 350, Boston, MA 02116, which is
(number, street, city or town, state, zip code)

- ☐ its principal office;
- ☐ an office of its transfer agent;
- ☐ an office of its secretary/assistant secretary;
- ☒ its registered office.

Signed by: 
(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☒ President,
- ☐ Other officer,
- ☐ Court-appointed fiduciary,

on this 22nd day of September, 2020.

**ATTACHMENT TO
ARTICLES OF DOMESTICATION
OF
CYPRESS TREE MANAGEMENT NATICK, INC.**

ARTICLE IV:

1. Voting. The holders of the Common Stock are entitled to one vote for each share held at all meetings of stockholders (and written actions in lieu of meetings). There shall be no cumulative voting.

The number of authorized shares of Common Stock may be increased or decreased (but not below the number of shares thereof then outstanding) by the affirmative vote of the holders of a majority of the stock of the Corporation entitled to vote.

2. Dividends. Dividends may be declared and paid on the Common Stock from funds lawfully available therefor as and when determined by the Board of Directors.

3. Liquidation. Upon the dissolution or liquidation of the Corporation, whether voluntary or involuntary, holders of Common Stock will be entitled to receive all assets of the Corporation available for distribution to its stockholders.

ARTICLE VI:

1. Minimum number of directors. The board of directors may consist of one or more individuals, notwithstanding the number of shareholders.

2. Personal liability of directors to corporation. No director shall have personal liability to the corporation for monetary damages for breach of his or her fiduciary duty as a director notwithstanding any provision of law imposing such liability, provided that this provision shall not eliminate or limit the liability of a director (a) for any breach of the director's duty of loyalty to the corporation or its shareholders, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (c) for improper distribution under section 6.10 of chapter 156d of the general laws of Massachusetts, as amended from time to time ("Chapter 156d"), or any successor provision to such section, or (d) for any transaction from which the director derived an improper personal benefit.

3. Shareholder vote required to approve matters acted on by shareholders. The affirmative vote of a majority of all shares in a voting group eligible to vote on a matter shall be sufficient for the approval of the matter, notwithstanding any greater vote on the matter otherwise required by any provision of Chapter 156d.

4. Shareholder action without a meeting by less than unanimous consent. Action required or permitted by Chapter 156d 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 action at a meeting at which all shareholders entitled to vote on the actions are present and voting.

5. 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, the articles of organization or the bylaws requires action by the shareholders;

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:

September 30, 2020 04:53 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BY-LAWS
OF
CYPRESS TREE MANAGEMENT NATICK, INC.

Adopted: April 17, 2020

ARTICLE I
STOCKHOLDERS

1.1 Place of Meetings. All meetings of stockholders shall be held at such place as may be designated from time to time by the Board of Directors, the Chairman of the Board or the President or, if not so designated, at the principal office of the corporation. The Board of Directors may, in its sole discretion, determine that a meeting shall not be held at any place, but may instead be held solely by means of remote communication in a manner consistent with the General Corporation Law of the State of Delaware.

1.2 Annual Meeting. Unless directors are elected by consent in lieu of an annual meeting, the annual meeting of stockholders for the election of directors and for the transaction of such other business as may properly be brought before the meeting shall be held on a date and at a time designated by the Board of Directors, the Chairman of the Board or the President (which date shall not be a legal holiday in the place where the meeting is to be held). If no annual meeting is held in accordance with the foregoing provisions, a special meeting may be held in lieu of the annual meeting, and any action taken at that special meeting shall have the same effect as if it had been taken at the annual meeting, and in such case all references in these By-laws to the annual meeting of the stockholders shall be deemed to refer to such special meeting.

1.3 Special Meetings. Special meetings of stockholders for any purpose or purposes may be called at any time by the Board of Directors, the Chairman of the Board or the President, but such special meetings may not be called by any other person or persons. Business transacted at any special meeting of stockholders shall be limited to matters relating to the purpose or purposes stated in the notice of meeting.

1.4 Notice of Meetings. Except as otherwise provided by law, written notice of each meeting of stockholders, whether annual or special, shall be given not less than 10 nor more than 60 days before the date of the meeting to each stockholder entitled to vote at such meeting. Without limiting the manner by which notice otherwise may be given to stockholders, any notice shall be effective if given by a form of electronic transmission consented to (in a manner consistent with the General Corporation Law of the State of Delaware) by the stockholder to whom the notice is given. The notices of all meetings shall state the place, if any, date and time of the meeting and the means of remote communications, if any, by which stockholders and

proxyholders may be deemed to be present in person and vote at such meeting. The notice of a special meeting shall state, in addition, the purpose or purposes for which the meeting is called. If notice is given by mail, such notice shall be deemed given when deposited in the United States Mail, postage prepaid, directed to the stockholder at such stockholder's address as it appears on the records of the corporation. If notice is given by electronic transmission, such notice shall be deemed given at the time specified in Section 232 of the General Corporation Law of the State of Delaware.

1.5 Voting List. The Secretary shall prepare, at least 10 days before every meeting of stockholders, a complete list of the stockholders entitled to vote at the meeting, arranged in alphabetical order, and showing the address of each stockholder and the number of shares registered in the name of each stockholder. Such list shall be open to the examination of any stockholder, for any purpose germane to the meeting for a period of at least 10 days prior to the meeting: (i) on a reasonably accessible electronic network, provided that the information required to gain access to such list is provided with the notice of the meeting, or (ii) during ordinary business hours, at the principal place of business of the corporation. If the meeting is to be held at a place, then the list shall be produced and kept at the time and place of the meeting during the whole time thereof, and may be inspected by any stockholder who is present. If the meeting is to be held solely by means of remote communication, then the list shall also be open to the examination of any stockholder during the whole time of the meeting on a reasonably accessible electronic network, and the information required to access such list shall be provided with the notice of the meeting.

1.6 Quorum. Except as otherwise provided by law, the Certificate of Incorporation or these By-laws, the holders of a majority of the shares of the capital stock of the corporation issued and outstanding and entitled to vote at the meeting, present in person, present by means of remote communication in a manner, if any, authorized by the Board of Directors in its sole discretion or represented by proxy, shall constitute a quorum for the transaction of business. A quorum, once established at a meeting, shall not be broken by the withdrawal of enough votes to have less than a quorum.

1.7 Adjournments. Any meeting of stockholders may be adjourned from time to time to any other time and to any other place at which a meeting of stockholders may be held under these By-laws by the stockholders present or represented at the meeting and entitled to vote, although less than a quorum, or, if no stockholder is present, by any officer entitled to preside at or to act as secretary of such meeting. It shall not be necessary to notify any stockholder of any adjournment of less than 30 days if the time and place, if any, of the adjourned meeting, and the means of remote communication, if any, by which stockholders and proxyholders may be deemed to be present in person and vote at such adjourned meeting, are announced at the meeting at which adjournment is taken, unless after the adjournment a new record date is fixed for the adjourned meeting. At the adjourned meeting, the corporation may transact any business which might have been transacted at the original meeting.

1.8 Voting and Proxies. Each stockholder shall have one vote for each share of stock entitled to vote held of record by such stockholder and a proportionate vote for each fractional share so held, unless otherwise provided by law or the Certificate of Incorporation. Each

stockholder of record entitled to vote at a meeting of stockholders, or to express consent or dissent to corporate action without a meeting, may vote or express such consent or dissent in person (including by means of remote communications, if any, by which stockholders may be deemed to be present in person and vote at such meeting) or may authorize another person or persons to vote or act for such stockholder by a proxy executed or transmitted in a manner permitted by the General Corporation Law of the State of Delaware by the stockholder or such stockholder's authorized agent and delivered (including by electronic transmission) to the Secretary of the corporation. No such proxy shall be voted or acted upon after three years from the date of its execution, unless the proxy expressly provides for a longer period.

1.9 Action at Meeting. When a quorum is present at any meeting, any matter other than the election of directors to be voted upon by the stockholders at such meeting shall be decided by the vote of the holders of shares of stock having a majority of the votes cast by the holders of all of the shares of stock present or represented and voting on such matter (or if there are two or more classes of stock entitled to vote as separate classes, then in the case of each such class, the holders of a majority of the stock of that class present or represented and voting on such matter), except when a different vote is required by law, the Certificate of Incorporation or these By-laws. When a quorum is present at any meeting, any election by stockholders of directors shall be determined by a plurality of the votes cast on the election.

1.10 Conduct of Meetings.

(a) Chairman of Meeting. Meetings of stockholders shall be presided over by the Chairman of the Board, if any, or in the Chairman's absence by the Vice Chairman of the Board, if any, or in the Vice Chairman's absence by the President, or in the President's absence by a Vice President, or in the absence of all of the foregoing persons by a chairman designated by the Board of Directors, or in the absence of such designation by a chairman chosen by vote of the stockholders at the meeting. The Secretary shall act as secretary of the meeting, but in the Secretary's absence the chairman of the meeting may appoint any person to act as secretary of the meeting.

(b) Rules, Regulations and Procedures. The Board of Directors of the corporation may adopt by resolution such rules, regulations and procedures for the conduct of any meeting of stockholders of the corporation as it shall deem appropriate including, without limitation, such guidelines and procedures as it may deem appropriate regarding the participation by means of remote communication of stockholders and proxyholders not physically present at a meeting. Except to the extent inconsistent with such rules, regulations and procedures as adopted by the Board of Directors, the chairman of any meeting of stockholders shall have the right and authority to prescribe such rules, regulations and procedures and to do all such acts as, in the judgment of such chairman, are appropriate for the proper conduct of the meeting. Such rules, regulations or procedures, whether adopted by the Board of Directors or prescribed by the chairman of the meeting, may include, without limitation, the following: (i) the establishment of an agenda or order of business for the meeting; (ii) rules and procedures for maintaining order at the meeting and the safety of those present; (iii) limitations on attendance at or participation in the meeting to stockholders of record of the corporation, their duly authorized and constituted proxies or such other persons as shall be determined; (iv) restrictions on entry to the meeting

after the time fixed for the commencement thereof; and (v) limitations on the time allotted to questions or comments by participants. Unless and to the extent determined by the Board of Directors or the chairman of the meeting, meetings of stockholders shall not be required to be held in accordance with the rules of parliamentary procedure.

1.11 Action without Meeting.

(a) Taking of Action by Consent. Any action required or permitted to be taken at any annual or special meeting of stockholders of the corporation may be taken without a meeting, without prior notice and without a vote, if a consent in writing, setting forth the action so taken, is signed by the holders of outstanding stock 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 entitled to vote on such action were present and voted. Except as otherwise provided by the Certificate of Incorporation, stockholders may act by written consent to elect directors; provided, however, that, if such consent is less than unanimous, such action by written consent may be in lieu of holding an annual meeting only if all of the directorships to which directors could be elected at an annual meeting held at the effective time of such action are vacant and are filled by such action.

(b) Electronic Transmission of Consents. A telegram, cablegram or other electronic transmission consenting to an action to be taken and transmitted by a stockholder or proxyholder, or by a person or persons authorized to act for a stockholder or proxyholder, shall be deemed to be written, signed and dated for the purposes of this section, provided that any such telegram, cablegram or other electronic transmission sets forth or is delivered with information from which the corporation can determine (A) that the telegram, cablegram or other electronic transmission was transmitted by the stockholder or proxyholder or by a person or persons authorized to act for the stockholder or proxyholder, and (B) the date on which such stockholder or proxyholder or authorized person or persons transmitted such telegram, cablegram or electronic transmission. The date on which such telegram, cablegram or electronic transmission is transmitted shall be deemed to be the date on which such consent was signed. No consent given by telegram, cablegram or other electronic transmission shall be deemed to have been delivered until such consent is reproduced in paper form and until such paper form shall be delivered to the corporation by delivery to its registered office in the State of Delaware, its principal place of business or an officer or agent of the corporation having custody of the book in which proceedings of meetings of stockholders are recorded. Delivery made to a corporation's registered office shall be made by hand or by certified or registered mail, return receipt requested. Notwithstanding the foregoing limitations on delivery, consents given by telegram, cablegram or other electronic transmission may be otherwise delivered to the principal place of business of the corporation or to an officer or agent of the corporation having custody of the book in which proceedings of meetings of stockholders are recorded if, to the extent and in the manner provided by resolution of the Board of Directors. Any copy, facsimile or other reliable reproduction of a consent in writing may be substituted or used in lieu of the original writing for any and all purposes for which the original writing could be used, provided that such copy, facsimile or other reproduction shall be a complete reproduction of the entire original writing.

(c) Notice of Taking of Corporate Action. Prompt notice of the taking of

corporate action without a meeting by less than unanimous written consent shall be given to those stockholders who have not consented in writing and who, if the action had been taken at a meeting, would have been entitled to notice of the meeting if the record date for such meeting had been the date that written consents signed by a sufficient number of holders to take the action were delivered to the corporation.

ARTICLE II

DIRECTORS

2.1 General Powers. The business and affairs of the corporation shall be managed by or under the direction of a Board of Directors, who may exercise all of the powers of the corporation except as otherwise provided by law, the Certificate of Incorporation or these By-laws. In the event of a vacancy in the Board of Directors, the remaining directors, except as otherwise provided by law, may exercise the powers of the full Board until the vacancy is filled.

2.2 Number; Election and Qualification. The number of directors which shall constitute the whole Board of Directors shall be determined from time to time by resolution of the stockholders or the Board of Directors, but in no event shall be less than one. Subject to the provisions of any agreement among the stockholders of the Corporation, the number of directors may be decreased at any time and from time to time either by the stockholders or by a majority of the directors then in office, but only to eliminate vacancies existing by reason of the death, resignation, removal or expiration of the term of one or more directors. The directors shall be elected at the annual meeting of stockholders by such stockholders as have the right to vote on such election. Directors need not be stockholders of the corporation.

2.3 Enlargement of the Board. The number of directors may be increased at any time and from time to time by the stockholders or by a majority of the directors then in office.

2.4 Tenure. Each director shall hold office until the next annual meeting and until a successor is elected and qualified, or until such director's earlier death, resignation or removal.

2.5 Vacancies. Unless and until filled by the stockholders, any vacancy in the Board of Directors, however occurring, including a vacancy resulting from an enlargement of the Board, may be filled by vote of a majority of the directors then in office, although less than a quorum, or by a sole remaining director. A director elected to fill a vacancy shall be elected for the unexpired term of such director's predecessor in office, and a director chosen to fill a position resulting from an increase in the number of directors shall hold office until the next annual meeting of stockholders and until a successor is elected and qualified, or until such director's earlier death, resignation or removal.

2.6 Resignation. Any director may resign by delivering a resignation in writing or by electronic transmission to the corporation at its principal office or to the Chairman of the Board, the President or the Secretary. Such resignation shall be effective upon receipt unless it is specified to be effective at some later time or upon the happening of some later event.

2.7 Regular Meetings. Regular meetings of the Board of Directors may be held without notice at such time and place as shall be determined from time to time by the Board of Directors; provided that any director who is absent when such a determination is made shall be given notice of the determination. A regular meeting of the Board of Directors may be held without notice immediately after and at the same place as the annual meeting of stockholders.

2.8 Special Meetings. Special meetings of the Board of Directors may be held at any time and place designated in a call by the Chairman of the Board, President, two or more directors, or by one director in the event that there is only a single director in office.

2.9 Notice of Special Meetings. Notice of any special meeting of directors shall be given to each director by the Secretary or by the officer or one of the directors calling the meeting. Notice shall be duly given to each director (i) by giving notice to such director in person or by telephone at least twenty four (24) hours in advance of the meeting, (ii) by sending a telegram, telecopy or electronic mail, or delivering written notice by hand, to such director's last known business, home or electronic mail address at least forty eight (48) hours in advance of the meeting, or (iii) by sending written notice, via first-class mail or reputable overnight courier, to such director's last known business or home address at least seventy two (72) hours in advance of the meeting. A notice or waiver of notice of a meeting of the Board of Directors need not specify the purposes of the meeting.

2.10 Meetings by Conference Communications Equipment. Directors may participate in meetings of the Board of Directors or any committee thereof by means of conference telephone or other communications equipment by means of which all persons participating in the meeting can hear each other, and participation by such means shall constitute presence in person at such meeting.

2.11 Quorum. A majority of the total number of the whole Board of Directors shall constitute a quorum at all meetings of the Board of Directors. In the event one or more of the directors shall be disqualified to vote at any meeting, then the required quorum shall be reduced by one for each such director so disqualified; provided, however, that in no case shall less than one-third of the number of directors fixed pursuant to Section 2.2 of these By-laws constitute a quorum. In the absence of a quorum at any such meeting, a majority of the directors present may adjourn the meeting from time to time without further notice other than announcement at the meeting, until a quorum shall be present.

2.12 Action at Meeting. At any meeting of the Board of Directors at which a quorum is present, the vote of a majority of those present shall be sufficient to take any action, unless a different vote is specified by law, the Certificate of Incorporation or these By-laws.

2.13 Action by Consent. Any action required or permitted to be taken at any meeting of the Board of Directors or of any committee thereof may be taken without a meeting, if all members of the Board or committee, as the case may be, consent to the action in writing or by electronic transmission, and the written consents and electronic transmissions are filed with the minutes of proceedings of the Board or committee.

2.14 Removal. Except as otherwise provided by the General Corporation Law of the State of Delaware, any one or more or all of the directors may be removed, with or without cause, by the holders of a majority of the shares then entitled to vote at an election of directors, except that the directors elected by the holders of a particular class or series of stock may be removed without cause only by vote of the holders of a majority of the outstanding shares of such class or series.

2.15 Committees. The Board of Directors may designate one or more committees, each committee to consist of one or more of the directors of the corporation. The Board may designate one or more directors as alternate members of any committee, who may replace any absent or disqualified member at any meeting of the committee. In the absence or disqualification of a member of a committee, the member or members of the committee present at any meeting and not disqualified from voting, whether or not such member or members constitute a quorum, may unanimously appoint another member of the Board of Directors to act at the meeting in the place of any such absent or disqualified member. Any such committee, to the extent provided in the resolution of the Board of Directors and subject to the provisions of law, shall have and may exercise all the powers and authority of the Board of Directors in the management of the business and affairs of the corporation and may authorize the seal of the corporation to be affixed to all papers which may require it. Each such committee shall keep minutes and make such reports as the Board of Directors may from time to time request. Except as the Board of Directors may otherwise determine, any committee may make rules for the conduct of its business, but unless otherwise provided by the directors or in such rules, its business shall be conducted as nearly as possible in the same manner as is provided in these By-laws for the Board of Directors.

2.16 Compensation of Directors. Directors may be paid such compensation for their services and such reimbursement for expenses of attendance at meetings as the Board of Directors may from time to time determine. No such payment shall preclude any director from serving the corporation or any of its parent or subsidiary corporations in any other capacity and receiving compensation for such service.

ARTICLE III

OFFICERS

3.1 Titles. The officers of the corporation shall consist of a President, a Secretary, a Treasurer and such other officers with such other titles as the Board of Directors shall determine, including a Chairman of the Board, a Vice-Chairman of the Board, and one or more Vice Presidents, Assistant Treasurers, and Assistant Secretaries. The Board of Directors may appoint such other officers as it may deem appropriate.

3.2 Election. The President, Treasurer and Secretary shall be elected annually by the Board of Directors at its first meeting following the annual meeting of stockholders. Other officers may be appointed by the Board of Directors at such meeting or at any other meeting.

3.3 Qualification. No officer need be a stockholder. Any two or more offices may be

held by the same person.

3.4 Tenure. Except as otherwise provided by law, by the Certificate of Incorporation or by these By-laws, each officer shall hold office until such officer's successor is elected and qualified, unless a different term is specified in the resolution electing or appointing such officer, or until such officer's earlier death, resignation or removal.

3.5 Resignation and Removal. Any officer may resign by delivering a written resignation to the corporation at its principal office or to the Chief Executive Officer or the Secretary. Such resignation shall be effective upon receipt unless it is specified to be effective at some later time or upon the happening of some other event.

Any officer may be removed at any time, with or without cause, by vote of a majority of the entire number of directors then in office.

Except as the Board of Directors may otherwise determine, no officer who resigns or is removed shall have any right to any compensation as an officer for any period following such officer's resignation or removal, or any right to damages on account of such removal, whether such officer's compensation be by the month or by the year or otherwise, unless such compensation is expressly provided in a duly authorized written agreement with the corporation.

3.6 Vacancies. The Board of Directors may fill any vacancy occurring in any office for any reason and may, in its discretion, leave unfilled for such period as it may determine any offices other than those of President, Treasurer and Secretary. Each such successor shall hold office for the unexpired term of such officer's predecessor and until a successor is elected and qualified, or until such officer's earlier death, resignation or removal.

3.7 Chairman of the Board. The Board of Directors may appoint from its members a Chairman of the Board. If the Board of Directors appoints a Chairman of the Board, such Chairman shall perform such duties and possess such powers as are assigned by the Board of Directors and, if the Chairman of the Board is also designated as the corporation's Chief Executive Officer, shall have the powers and duties of the Chief Executive Officer prescribed in Section 3.8 of these By-laws. Unless otherwise provided by the Board of Directors, the Chairman of the Board shall preside at all meetings of the Board of Directors and stockholders.

3.8 President; Chief Executive Officer. Unless the Board of Directors has designated the Chairman of the Board or another person as the corporation's Chief Executive Officer, the President shall be the Chief Executive Officer of the corporation. The Chief Executive Officer shall have general charge and supervision of the business of the Corporation subject to the direction of the Board of Directors. The President shall perform such other duties and shall have such other powers as the Board of Directors and the Chief Executive Officer (if the Chairman of the Board or another person is serving in such position) may from time to time prescribe.

3.9 Vice Presidents. Any Vice President shall perform such duties and possess such powers as the Board of Directors or the Chief Executive Officer may from time to time prescribe. In the event of the absence, inability or refusal to act of the Chief Executive Officer,

the President (if the President is not the Chief Executive Officer), and then the Vice President (or if there shall be more than one, the Vice Presidents in the order determined by the Board of Directors) shall perform the duties of the Chief Executive Officer and when so performing shall have all the powers of and be subject to all the restrictions upon the Chief Executive Officer. The Board of Directors may assign to any Vice President the title of Executive Vice President, Senior Vice President or any other title selected by the Board of Directors.

3.10 Secretary and Assistant Secretaries. The Secretary shall perform such duties and shall have such powers as the Board of Directors or the Chief Executive Officer may from time to time prescribe. In addition, the Secretary shall perform such duties and have such powers as are incidental to the office of the secretary, including without limitation the duty and power to give notices of all meetings of stockholders and special meetings of the Board of Directors, to attend all meetings of stockholders and the Board of Directors and keep a record of the proceedings, to maintain a stock ledger and prepare lists of stockholders and their addresses as required, to be custodian of corporate records and the corporate seal and to affix and attest to the same on documents.

Any Assistant Secretary shall perform such duties and possess such powers as the Board of Directors, the Chief Executive Officer or the Secretary may from time to time prescribe. In the event of the absence, inability or refusal to act of the Secretary, the Assistant Secretary (or if there shall be more than one, the Assistant Secretaries in the order determined by the Board of Directors) shall perform the duties and exercise the powers of the Secretary.

In the absence of the Secretary or any Assistant Secretary at any meeting of stockholders or directors, the chairman of the meeting shall designate a temporary secretary to keep a record of the meeting.

3.11 Treasurer and Assistant Treasurers. The Treasurer shall perform such duties and shall have such powers as may from time to time be assigned by the Board of Directors or the Chief Executive Officer. In addition, the Treasurer shall perform such duties and have such powers as are incident to the office of treasurer, including without limitation the duty and power to keep and be responsible for all funds and securities of the corporation, to deposit funds of the corporation in depositories selected in accordance with these By-laws, to disburse such funds as ordered by the Board of Directors, to make proper accounts of such funds, and to render as required by the Board of Directors statements of all such transactions and of the financial condition of the corporation.

The Assistant Treasurers shall perform such duties and possess such powers as the Board of Directors, the Chief Executive Officer or the Treasurer may from time to time prescribe. In the event of the absence, inability or refusal to act of the Treasurer, the Assistant Treasurer (or if there shall be more than one, the Assistant Treasurers in the order determined by the Board of Directors) shall perform the duties and exercise the powers of the Treasurer.

3.12 Salaries. Officers of the corporation shall be entitled to such salaries, compensation or reimbursement as shall be fixed or allowed from time to time by the Board of Directors.

ARTICLE IV

CAPITAL STOCK

4.1 Issuance of Stock. Unless otherwise voted by the stockholders and subject to the provisions of the Certificate of Incorporation, the whole or any part of any unissued balance of the authorized capital stock of the corporation or the whole or any part of any shares of the authorized capital stock of the corporation held in the corporation's treasury may be issued, sold, transferred or otherwise disposed of by vote of the Board of Directors in such manner, for such lawful consideration and on such terms as the Board of Directors may determine.

4.2 Certificates of Stock; Uncertificated Shares. Every holder of stock of the corporation shall be entitled to have a certificate, in such form as may be prescribed by law and by the Board of Directors, certifying the number and class of shares owned by such holder in the corporation. Each such certificate shall be signed by, or in the name of the corporation by, the Chairman or Vice-Chairman, if any, of the Board of Directors, or the President or a Vice President, and the Treasurer or an Assistant Treasurer, or the Secretary or an Assistant Secretary of the corporation. Any or all of the signatures on the certificate may be a facsimile.

Each certificate for shares of stock which are subject to any restriction on transfer pursuant to the Certificate of Incorporation, these By-laws, applicable securities laws or any agreement among any number of stockholders or among such holders and the corporation shall have conspicuously noted on the face or back of the certificate either the full text of the restriction or a statement of the existence of such restriction.

If the corporation shall be authorized to issue more than one class of stock or more than one series of any class, the powers, designations, preferences and relative, participating, optional or other special rights of each class of stock or series thereof and the qualifications, limitations or restrictions of such preferences and/or rights shall be set forth in full or summarized on the face or back of each certificate representing shares of such class or series of stock, provided that in lieu of the foregoing requirements there may be set forth on the face or back of each certificate representing shares of such class or series of stock a statement that the corporation will furnish without charge to each stockholder who so requests a copy of the full text of the powers, designations, preferences and relative, participating, optional or other special rights of each class of stock or series thereof and the qualifications, limitations or restrictions of such preferences and/or rights.

Notwithstanding the foregoing, the board of directors of the corporation may provide by resolution or resolutions that some or all of any or all classes of series of its stock shall be uncertificated shares, in which case a record of the owners thereof shall be maintained in book-entry form by the corporation's transfer agent for such class or series of stock. Within a reasonable time after the issuance or transfer of uncertificated stock, the corporation shall send to the registered owner thereof a written notice containing the information required to be set forth or stated on certificates pursuant to Sections 151, 202(a) or 218(a) of the General Corporation Law of the State of Delaware or, with respect to Section 151 of General Corporation Law of the

State of Delaware, a statement that the corporation will furnish without charge to each stockholder who so requests the powers, designations, preferences and relative participating, optional or other special rights of each class of stock or series thereof and the qualifications, limitations or restrictions of such preferences and/or rights.

4.3 Record Date. The Board of Directors may fix in advance a date as a record date for the determination of the stockholders entitled to notice of or to vote at any meeting of stockholders or to express consent (or dissent) to corporate action without a meeting, or entitled to receive payment of any dividend or other distribution or allotment of any rights in respect of any change, conversion or exchange of stock, or for the purpose of any other lawful action. Such record date shall not be more than 60 nor less than ten (10) days before the date of such meeting, nor more than 10 days after the date of adoption of a record date for a consent without a meeting, nor more than 60 days prior to any other action to which such record date relates.

If no record date is fixed, the record date for determining stockholders entitled to notice of or to vote at a meeting of stockholders shall be at the close of business on the day before the day on which notice is given, or, if notice is waived, at the close of business on the day before the day on which the meeting is held. If no record date is fixed, the record date for determining stockholders entitled to express consent to corporate action without a meeting, when no prior action by the Board of Directors is necessary, shall be the day on which the first consent is properly delivered to the corporation. If no record date is fixed, the record date for determining stockholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating to such purpose.

A determination of stockholders of record entitled to notice of or to vote at a meeting of stockholders shall apply to any adjournment of the meeting; provided, however, that the Board of Directors may fix a new record date for the adjourned meeting.

ARTICLE V

GENERAL PROVISIONS

5.1 Fiscal Year. Except as from time to time otherwise designated by the Board of Directors, the fiscal year of the corporation shall begin on the first day of January in each year and end on the last day of December in each year.

5.2 Corporate Seal. The corporate seal (if any) shall be in such form as shall be approved by the Board of Directors.

5.3 Waiver of Notice. Whenever notice is required to be given by law, by the Certificate of Incorporation or by these By-laws, a written waiver, signed by the person entitled to notice, or a waiver by electronic transmission by the person entitled to notice, whether before, at or after the time stated in such notice, shall be deemed equivalent to notice. Attendance of a person at a meeting shall constitute a waiver of notice of such meeting, except when the person attends a meeting for the express purpose of objecting at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened.

5.4 Voting of Securities. Except as the Board of Directors may otherwise designate, the President or Treasurer may waive notice of, and act as, or appoint any person or persons to act as, proxy or attorney-in-fact for this corporation (with or without power of substitution), at any meeting of stockholders or shareholders of any other corporation or organization, the securities of which may be held by this corporation.

5.5 Evidence of Authority. A certificate by the Secretary, or an Assistant Secretary, or a temporary Secretary, as to any action taken by the stockholders, directors, a committee or any officer or representative of the corporation shall as to all persons who rely on the certificate in good faith be conclusive evidence of such action.

5.6 Certificate of Incorporation. All references in these By-laws to the Certificate of Incorporation shall be deemed to refer to the Certificate of Incorporation of the corporation, as amended and in effect from time to time.

5.7 Transactions with Interested Parties. No contract or transaction between the corporation and one or more of the directors or officers, or between the corporation and any other corporation, partnership, association, or other organization in which one or more of the directors or officers are directors or officers, or have a financial interest, shall be void or voidable solely for this reason, or solely because the director or officer is present at or participates in the meeting of the Board of Directors or a committee of the Board of Directors at which the contract or transaction is authorized or solely because any such director's or officer's votes are counted for such purpose, if:

(a) The material facts as to the director's or officer's relationship or interest and as to the contract or transaction are disclosed or are known to the Board of Directors or the committee, and the Board or committee in good faith authorizes the contract or transaction by the affirmative votes of a majority of the disinterested directors, even though the disinterested directors be less than a quorum;

(b) The material facts as to the director's or officer's relationship or interest and as to the contract or transaction are disclosed or are known to the stockholders entitled to vote thereon, and the contract or transaction is specifically approved in good faith by vote of the stockholders; or

(c) The contract or transaction is fair as to the corporation as of the time it is authorized, approved or ratified, by the Board of Directors, a committee of the Board of Directors, or the stockholders.

Common or interested directors may be counted in determining the presence of a quorum at a meeting of the Board of Directors or of a committee which authorizes the contract or transaction.

5.8 Severability. Any determination that any provision of these By-laws is for any reason inapplicable, illegal or ineffective shall not affect or invalidate any other provision of

these By-laws.

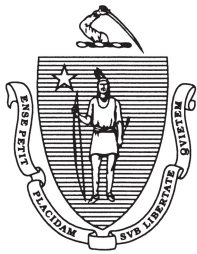
5.9 Pronouns. All pronouns used in these By-laws shall be deemed to refer to the masculine, feminine or neuter, singular or plural, as the identity of the person or persons may require.

ARTICLE VI

AMENDMENTS

6.1 By the Board of Directors. These By-laws may be altered, amended or repealed or new by-laws may be adopted by the affirmative vote of a majority of the directors present at any regular or special meeting of the Board of Directors at which a quorum is present.

6.2 By the Stockholders. These By-laws may be altered, amended or repealed or new By-laws may be adopted by the affirmative vote of the holders of a majority of the shares of the capital stock of the corporation issued and outstanding and entitled to vote at any regular meeting of stockholders, or at any special meeting of stockholders, provided notice of such alteration, amendment, repeal or adoption of new by-laws shall have been stated in the notice of such special meeting.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: April 14, 2021

To Whom It May Concern :

I hereby certify that according to the records of this office,

CYPRESS TREE MANAGEMENT NATICK, INC

is a domestic corporation organized on **September 30, 2020** , 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: 21040287210

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

Processed by: smc

Plan for Obtaining Liability Insurance

I. Purpose

The purpose of this plan is to outline how Cypress Tree Management Natick, Inc. (“CTMN”) will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement.

II. Research

CTMN has engaged with multiple insurance providers offering General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10). These providers are established in the legal marijuana industry. We are continuing these discussions with the insurance providers and will engage with the provider who best suits the needs of the company once we receive a Provisional License.

III. Plan

1. Once CTMN receives its Provisional Marijuana Establishment License we will engage with an insurance provider who is experienced in the legal marijuana industry.
 - a. CTMN 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.
 - b. The deductible for each policy will be no higher than \$5,000 per occurrence.
2. In the event that CTMN cannot obtain the required insurance coverage, CTMN will place a minimum of \$250,000 in an escrow account. These funds will be used solely for the coverage of liabilities.
 - a. CTMN will replenish this account within ten business days of any expenditure.
3. CTMN will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.



Cypress Tree Management Natick

**Cypress Tree Management Natick, Inc.
Business Plan
December 2020**

EXECUTIVE SUMMARY

Cypress Tree Management Natick, Inc. (“CTM”) is a Massachusetts corporation that has an application to open locally and state-licensed Adult-Use Marijuana Retail Establishment. CTM’s dispensaries will be operated under the name “Redi” (pronounced ready) and we will use the Redi name when referring to the customer facing retail operations.

CTM’s mission is to be a best-in-class educator to consumers of today’s cannabis products. When CTM opens its facilities they will be clean, modern facilities focused on health and wellness. We are committed to providing safe, high-quality products that are professionally grown, processed, packaged and presented to customers in a comfortable and secure environment. Our employees will be attentive and professional, trained to serve customers with respect and compassion.

CTM’s executive team has a broad range of knowledge and business experience including finance, real estate development, manufacturing, cannabis cultivation and manufacturing, and dispensary operations. Our team has a proven track-record of success in starting and operating new business ventures.

CTM is committed to sourcing talented and skilled resources to fill positions in the operational team. CTM’s executive team understands the critical nature of a strong operational team for the ultimate success of the business. To attract and retain the best personnel, CTM is committed to competitive compensation, benefits, paid time off and an employee stock option plan. CTM has hired a Director of Retail, Retail Operations Manager and Retail IT Manager as part of its core executive team. All three of these hires have deep experience in the Massachusetts regulated cannabis industry having worked for other Massachusetts cannabis companies.

CTM anticipates opening its first retail dispensary in Newton MA in the spring of 2021. We have a submitted application for a Retail Marijuana Establishment in the Fenway neighborhood of Boston, Massachusetts, where we have received a Host Community Agreement from Boston and have received approval from Boston Zoning Board of Appeal for the special permit.

CTM has the financial resources in place to realistically achieve our vision of a model cannabis operation in Massachusetts.



Cypress Tree Management Natick

COMPANY DESCRIPTION

CTM is a company established to comply with all regulations and operations of 935 CMR 500.000 for adult-use operations in Massachusetts. CTM plans to operate three (3) premier dispensaries locations in MA and to become a full vertical operating with cultivation and product manufacturing.

CTM is a for-profit corporation. It is governed by a 3-person Board of Directors.

CTM's plan for its dispensary operations are to differentiate itself through customer education. We will focus on understanding today's cannabis products and proper dosing to achieve the desired effect, to get consumers away from just seeking high THC products and costs per milligram, and instead identifying the right product for their specific need.

CTM plans to generate approximately \$20MM in sales by year three (3) of operations and cash flow positive by year two (2) of operations.

MARKET ANALYSIS

The Massachusetts adult-use cannabis market enters its third year of operations since the first adult-use dispensaries opened in the state. 2020 had gross sales of approximately \$700MM, which includes a near 10-week shutdown ordered by the Governor due to COVID concerns, demonstrates how robust the market is. There are approximately 80 dispensaries in operation throughout the state. It is estimated that there are over 700,000 adult-use customers in MA and the market is projected to be a \$1.2B industry in 2021. Given the limited number of dispensary licenses in the state, and in particular in the locations CTM has sited in, the market-share and therefore revenue opportunity for each permitted dispensary is amongst the most compelling nationally.

Specific to CTM, our Host Community Agreement awarded by Natick enjoys significant retail traffic at the Cloverleaf Mall. The site is located on Speen Street, in-between Route 9 and Route 30, and is across the Speen Street from the Natick Mall. The Cloverleaf Mall's other tenants include Total Wines, Aldi, Burlington Coat Factory, and Guiter Center. The Mall has approximately 650 parking spots, which provides more than ample customer parking.



Experienced and provide executives in Victor Chiang, Todd Finard and Eric Liebman founded CTM.

CEO and Board of Directors

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Cypress Tree Management Natick

Todd Finard

Board of Directors

Todd is Chief Executive Officer of Finard Properties. In the 25 years that Todd has been a real estate developer, he has become an active leader in the communities in which he operates. He is a founder of the Combined Jewish Philanthropies Next Generation Housing Corporation, a housing platform for adults with disabilities in the Boston area. He is the immediate past Chairman of the Board of Hebrew SeniorLife – the largest geriatric care provider in New England. Currently, Todd serves as the Chairman of the Board of Advisors for the School at the Museum of Fine Arts at Tufts University, his alma mater. Todd grew up in, and continues to reside in Weston with his family.

Eric Liebman

Board of Directors

Eric has spent over 20 years working in real estate both in the Boston area and New York. Eric spent 8 years working in manufacturing and retail for a family run business with offices in Boston, Hong Kong and China, where their customers were major big-box retailers. Prior to that, Eric was involved in the initial launch of the Boloco restaurant group as an equity holder and instrumental in open the first store in Fenway. Eric is a lifetime member and supporter of the West End House Boys and Girls Club of Allston and has recently returned from Cambodia, having volunteered at the Children's Center in Phnom Pehn. Eric grew-up in Brookline and currently resides in Somerville with his family.

Lisa Burke

Director of Retail

Lisa has been a part of the regulated cannabis market in Massachusetts since its legalization in 2015. She was one of the retail managers at New England Treatment Access' adult-use and medical dispensary in Brookline, MA, overseeing over 190 staff. She has been a part of NETA's retail organization since its inception and was an integral part of its growth as the premier operator in the MA cannabis market. The Brookline dispensary is by far the largest revenue generating dispensary in MA. In her role she helped develop and implement all aspects of their retail operations, which currently services between 2,500-3,200 customers per day. She brings a deep cannabis knowledge and experience in educating and servicing both experienced and new cannabis users. Lisa resides in Somerville with her family.

Paris Caldwell

Director of Operations

Paris has been a part of the regulated cannabis market in Massachusetts since graduating from the University of Massachusetts, Boston, having joined New England Treat Access' adult-use and medical dispensary in Brookline, MA, where she was quickly promoted to Operations Manager. Her primary



Cypress Tree Management Natick

focus was on store operations, collaboration between NETA's two stores, hiring, payroll management, active community outreach and sales expansion. Born and raised in Newton, MA in a family of teachers and doctors, she has been instilled with the value of improving others' quality of life and brings this core value to the cannabis retail operations. Paris lives currently lives in Allston.

Rick Nagle

Director of Security

Rick worked in Massachusetts law enforcement for over 30 years. He spent 10 years as an investigator for both the Norfolk County and Plymouth County District Attorneys' offices, before being assigned to the Commonwealth's Cold Case Unit. He then became a supervisor in the State Police's Crisis Management office, and then was promoted to Narcotics Inspector with the Massachusetts State Police. His duties included being responsible for all narcotic evidence seized by the Massachusetts State Police. Rick was also in charge of reviewing and developing security policies and procedures for the State Police. At Cypress Tree, Rick will be developing policies and procedures relative to interior and exterior security of the CTM facilities. Rick will also be actively involved in hiring and training all security personnel.

CTM has a comprehensive hiring plan to guide the recruitment, hiring and management of its employees to fill the remainder of the retail staff. This includes:

1. Definition of responsibilities;
2. Clear chain of authority;
3. Well-paid, well-qualified, well-trained personnel;
4. Professional recreating practices with a commitment to diversity hiring;
5. Retention programs to retain and promote from within; and
6. Thorough training of all employees.

Recruitment

CTM's recruitment efforts will be primarily directed with the following qualifications:

1. At least twenty-one (21) years of age;
2. Local residents;
3. Preference for minority, veterans and individual with non-violent drug convictions candidates;
and
4. Health-related education/professional backgrounds.



Cypress Tree Management Natick

Training

Qualified candidates will participate in a rigorous training program and be evaluated for suitability to fulfill their designated role. Training will include careful review of all training materials, attending lectures by qualified professionals and on-the-job training. In addition to job specific training, training will include:

Legal – Legal training will cover all Massachusetts regulations and laws related to marijuana. Legal obligations of licenses marijuana dispensaries will be emphasized. Other topics will include the rules and regulations of the dispensary, sexual harassment training, effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana adult-use customers.

Security – Security training will be provided by CTM’s Director of Security and will cover prevention of diversion of cannabis products, distress and panic alarm procedures, perimeter and entrance control and robbery response techniques.

SERVICE AND PRODUCT

Cypress Tree Management brings a deep focus on the retail operations and customer service. CTM’s objective is to site and operate three dispensaries, where each are sited in high traffic, class-A retail locations. CTM will operate its dispensary footprint under the retail store name Redi (pronounced ready). Redi’s retail service experience will be designed around providing products for the customers’ desired experience and not simply a percentage THC sale. For example, understanding that the customer is looking for a product to help them with sleeping or anxiety or energy and how they want to consume (*i.e.*, may customers do not want an inhalation product), to then recommend the right product selection. Our sales approach will not be to sell tested percentage THC, as we believe that is analogous to a customer buying a bottle of wine by asking about its alcohol content. Redi also believes the sales process must including educating new consumers about safe storage practices, providing available research on the risks of consumption and what proper dosing means. We believe our target customer is the legal consumer of cannabis who likely has limited experience in consuming cannabis in recent years, but has been reading and hearing about the potential benefits of cannabis versus other pharmaceutical drugs. This consumer class will assess their experience and thereby their likely to be a repeat customer not only on their in-store experience but also on the quality of the product and if it achieved the desired results.

While CTM intends to pursue the full vertical license, it will initially open Natick relying on wholesale products. Redi’s product lines within the dispensary will include:

Product Line	Description
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Cypress Tree Management Natick

Flowers	Marijuana “buds” are dried and then either rolled into papers, smoked in a standard pip or a water pipe, or vaporizer products.
Extracts	Extracts are concentrated doses of the trichomes, the part of the plant that contains the cannabinoid compounds.
Preparations	Tinctures, joints, dermals, nectars, salves, etc.
Edibles	Food and drinks infused with marijuana concentrate.
Accessories	Products used for consumption of marijuana products, books and DVD’s related to marijuana use, etc.

MARKETING AND SALES

Cypress Tree Management will be compliant with all regulations and operations of 9335 CMR 500.000 for adult-use operations in Massachusetts as they apply to marketing and advertising, packaging and labeling, and direct marketing to customers.

Branding and Positioning

CTM believes the majority of consumers are seeking alternative products than traditional alcohol and pharmaceuticals that fit their health and wellness objections. This health and wellness lifestyle is what CTM hopes to support by delivering on the following qualities in our dispensaries:

1. Service Orientation – CTM will employ compassionate, engaging people, who will be highly trained on cannabis products and their potential effects. We are truly committed to quality service and to providing expert information.
2. Quality Products – CTM will source state-approved and tested quality products. In our wholesale purchasing efforts, our goal will be to identify and acquire quality and consistent products that will ensure our customers have the same experience each time they purchase from CTM.
3. Merchandising – CTM will leverage retail expertise to display and educate consumers on all of the product lines so consumers are making informed purchase decisions.

Marketing

The following are CTM’s marketing objectives for its first two years of operations:

1. Educate the Consumer Base – Knowledge and attitudes towards cannabis today remains challenged with misinformation and often continues to combat historical stigma. We can attract



Cypress Tree Management Natick

new consumers by educating the public about cannabis as a safe and viable alternative to alcohol and pharmaceutical products.

2. Increase Brand Awareness – CTM will develop and implement loyalty programs and word-of-mouth advertising campaigns to increase awareness of CTM's brand.
3. Increased Community Outreach – A strong community outreach program will be core to each dispensary's operations. By working with the neighboring community groups and participating in area events, the dispensaries will work to become an essential member of the community. Outreach will build awareness, relationships and cooperation that will lead to referrals and more customers over time.

Marketing Strategies

Word of mouth and a social media campaign are two of the most important ways to attract customers and build brand awareness.

Advertising – CTM anticipates spending approximately 1-1.5% of its gross monthly sales on advertising and marketing costs in its first years of operations. The advertising messaging will be primarily educational and focused on cannabis as a legal, safe and available product. Under our Redi name we will strive to have a strong social media presence.

Community Participation – CTM will work with local community groups to find volunteer opportunities.

Public Relations – CTM will also increase awareness and positive information about our brands and services by forming positive relationships with local media sources. Periodic press releases will be provided to local media, including *The Boston Globe*, to highlight Redi's products and work in the community.

Member Marketing – Marketing to our pre-existing customers is a crucial piece of Redi's brand awareness. Redi will work to educate our members and promote our products and services. For example, we will offer private consultations to educate members about various products, safe consumption and safe storage. We will also offer these consultations via Zoom meetings.

Word of Mouth Marketing – Customers satisfied with CTM will tell others. Therefore, we will put significant effort into an exceptional customer experience with each touchpoint we have. CTM will also develop formal referral programs that encourages current members to refer a friend.

Sales Strategies

As a customer focused retail operator, Redi's approach to sales will focused on the customer's needs and understanding the experience they are seeking or the ailment they are looking to treat, rather than trying to sell them a product. Redi will provide ongoing training to its staff to prepare them to identify the right product or products to achieve a customer's desired cannabis experience or help with their identified



Cypress Tree Management Natick

ailment. Dispensary management will monitor employee performance by tracking transaction data and shadowing them on customer interactions. Individual feedback and regular staff meetings will be used as training opportunities to continually push staff to improve.

Locations/Facilities

Finding a class-A retail location and designing the interior space is essential to building our desired brand. The dispensary location and viability as a strong retail location with high traffic counts is essential to CTM's success.

Site Selection

CTM's dispensary will be at 321 Speen Street, Natick, Massachusetts. The location is in the Cloverleaf Mall, which is in-between Route 9 and Route 30.



Cypress Tree Management Natick

FINANCIAL PROJECTIONS

Cypress Tree Management Natick Financial Pro Forma:

		Assumption	2021	2022	2023	Total	%
REVENUE			\$1,363,200	\$20,219,200	\$23,990,400	\$45,572,800	
	Natick						
TOTAL REVENUE			\$1,363,200	\$20,219,200	\$23,990,400	\$45,572,800	
NATICK COST OF GOODS SOLD							
	Natick Wholesale Flower Cost		\$392,602	\$5,516,649	\$6,201,086	\$12,110,337	
	Natick Wholesale MIPS Cost		\$335,778	\$4,718,187	\$5,280,959	\$10,334,923	
	Natick Accessories		\$28,627	\$424,603	\$503,798	\$957,029	
TOTAL COSTS OF GOODS SOLD			\$757,006	\$10,659,439	\$11,985,843	\$23,402,289	51.4%
TOTAL GROSS PROFITS			\$606,194	\$9,559,761	\$12,004,557	\$22,170,511	48.6%
DISPENSARY EXPENSES							
	Natick		\$293,314	\$4,158,408	\$4,910,548	\$9,362,270	
TOTAL DISPENSARY EXPENSE			\$293,314	\$4,158,408	\$4,910,548	\$9,362,270	
EBITDA			\$312,880	\$5,401,353	\$7,094,009	\$12,808,241	28.1%
	Federal Income Tax	21%	\$127,301	\$2,007,550	\$2,520,957	\$4,655,807	
	State Income Tax	8%	\$48,495	\$764,781	\$960,365	\$1,773,641	
Net Income			\$137,084	\$2,629,022	\$3,612,687	\$6,378,793	14.0%

Energy Compliance Plan

At all times, Cypress Tree Management Natick, Inc.'s ("CTMN") Retail Marijuana Establishment will satisfy minimum energy efficiency and conservation standards as required by the Commission and in accordance with 935 CMR 500.105(15). CTMN will strive to reduce energy demand, including by not limited to, the following:

- Use of natural lighting where feasible;
- Purchase and installation of LED lights that we received through AECOM and their energy savings program;
- Utilization of advanced and energy efficient HVAC systems;
- Insulated glazing;
- New building insulation, where feasible;
- New exterior doors; and
- Consider opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable.

The project will be in compliance with the International Building Code's requirements for sustainable and energy conservation in construction. CTMN will work closely with the utility to create and execute an energy savings plan, including:

- Understanding of how we consume energy through analysis generation;
- Compare our operation with similar businesses and act accordingly;
- Solicit customized energy improvement recommendations from professionals and determine how and if such recommendations can be incorporated into our business plan; and
- Identify cost incentives through utility energy programs and other energy efficiency programs offered pursuant to MGL c. 25 §21, such as Mass Save programs, or through municipal lighting plants, to explore financial incentives for energy efficiency and demand reduction measures.

Maintaining of Financial Records

Cypress Tree Management Natick, Inc.'s ("CTMN") policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall 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, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the non-profit corporation.

CTMN will implement separate accounting practices for marijuana and non-marijuana sales pursuant to 935 CMR 500.140(5)(f).

CTMN will conduct monthly sales equipment and data software checks and initiate reporting requirements for discovery of software manipulation as required by 935 CMR 500.140(5)(d). CTMN will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). CTMN will conduct 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 or alter sales data. CTMN will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If CTMN determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will: disclose the information to the Commission; cooperate with the Commission in an investigation relative to data manipulation; and take other action as directed by the Commission to comply with the applicable regulations. Pursuant to 935 CMR 500.140(5)(e), CTMN will comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.

CTMN financial records will be available for inspection by the Commission, upon request. The financial records will be maintained in accordance with generally accepted accounting principles. Following the closure of CTMN, all records will be kept for at least two years at the expense of CTMN and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(5)(e).

Personnel Policies Summary

It is Cypress Tree Management Natick, Inc. (“CTMN”) policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. CTMN will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of CTMN that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. CTMN will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID; and key state and local laws.

CTMN will maintain records of compliance with all training requirements pursuant to 935 CMR 500.105(2). The records will be maintained for four years and CTMN will make the records available for inspection upon request. All of our employees who are agents of the adult use marijuana establishment and the MTC at our CMO locations will receive the training required for each license under which the agent is registered, including, without limitation, with respect to patient privacy and confidentiality requirements, which may result in instances that would require such an agent to participate in more than 8 hours of training.

All CTMN policies will include a staffing plan and corresponding records in compliance with 935 CMR 500.105(1)(i) and ensure that all employees are aware of the alcohol, smoke, and drug-free workplace policies in accordance with 935 CMR 500.105(1)(k). CTMN will also implement policies to ensure the maintenance of confidential information pursuant to 935 CMR 500.105(1)(l). CTMN will enforce a policy for the immediate dismissal of agents for prohibited offenses including but not limited to diversion of marijuana, unsafe practices, or a conviction or guilty pleas for a felony charge of distribution to a minor according to 935 CMR 105(1)(m).

All CTMN employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by CTMN and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

Policy for Restricting Access to Age 21 and Older

- I. **Intent** Cypress Tree Management Natick, Inc.'s ("CTMN") Marijuana Establishment operations will be compliant with all regulations outlined in 935 CMR 500. et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNCB") or any other regulatory agency.
- II. **Purpose** The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that access to our facility is restricted to only persons who are 21 years of age or older.

III. **Definitions**

Adult-use Cannabis or Marijuana means Marijuana that is cultivated, processed, transferred, tested or sold to adults 21 years of age or older in compliance with 935 CMR 500.000

Adult-use Cannabis or Marijuana Products means Marijuana Products that are processed, manufactured, transferred, tested or sold to adults 21 years of age or older in compliance with 935 CMR 500.000

Consumer means a person who is 21 years of age or older.

Law Enforcement Authorities means local law enforcement unless otherwise indicated.

Proof of Identification means a government issued photograph that contains the name, date of birth, physical description and signature of the individual and is currently valid (in other words, not expired). CTMN will only accept the following forms of proof of identification that include all of the above criteria;

1. Massachusetts driver's license
2. Massachusetts Issued ID card
3. Out-of-state driver's license or ID card
4. Government issued Passport
5. U.S. Military ID

Visitor means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, provided, however, that no such individual shall be younger than 21 years old.

IV. Responsibilities

CTMN's Management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of CTMN are 21 years of age or older.

CTMN will positively identify all individuals seeking access to the facility to limit access solely to individuals 21 years of age or older;

V. Access to the Facility

CTMN only allows the following individuals into our Retail Marijuana Facility. For the purposes of this Policy the term Establishment also refers to any vehicle owned, leased, rented or otherwise used by CTMN for the transportation of Marijuana.

Upon entry into the facility by an individual, an CTMN agent will immediately inspect the individual's proof of identification and determine that the individual is 21 years of age or older. A patient registration card is not sufficient proof of age.

Other individuals who can access the facility include:

1. CTMN Agents (including board members, directors, employees, executives, managers, or volunteers)
 - a. While at the facility or transporting marijuana for the facility all CTMN Agents must carry their valid Agent Registration Card issued by the Commission
 - b. All CTMN Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
2. Visitors (including outside vendors and contractors)
 - a. Prior to being allowed access to the facility or any Limited Access Area, the visitor must produce a Government issued Identification Card to a member of the management team and have their age verified to be 21 years of age or older.
 - i. If there is any question as to the visitors age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access.
 - b. After the age of the visitor is verified they will be given a Visitor Identification Badge
 - c. Visitors will be escorted at all times by a marijuana establishment agent authorized to enter the limited access area.
 - d. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exit.
 - i. The visitor log will be available for inspection by the Commission at all times
3. Representatives of the Commission, Emergency Responders and Law Enforcement.
 - a. The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

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- i. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
 - ii. Representatives of other state agencies of the Commonwealth; and
 - iii. Emergency responders in the course of responding to an emergency.
 - iv. Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
- b. Individuals described above in this policy will be granted immediate access to the facility.

VI. Age Verification

To verify an individual is 21 or older an CTMN Agent must receive and examine from the individual one of the following authorized government issued ID Cards;

- i. Massachusetts Issued driver's license
 - ii. Massachusetts Issued ID card
 - iii. Out-of-state driver's license or ID card (with photo)
 - iv. Passport
 - v. U.S. Military I.D.
- a. To verify the age of the individual the Agent will use an Age Verification Smart ID Scanner that will be supplied by CTMN.
- b. In the event that the ID is not a scannable ID, or if for any reason the scanner is not operational or available or if the ID is questionable the Agent must use the **FLAG** methodology of ID verification

F. Feel

- Have the customer remove the ID from their wallet or plastic holder (never accept a laminated document)
- Feel for information cut-out or pasted on (especially near photo and birth date areas)
- Feel the texture – most driver's license should feel smooth, or (depending on your State) they will have an identifying texture

L. Look

- Look for the State seals or water marks; these seals are highly visible without any special light.
- Look at the photograph. Hairstyles, eye makeup and eye color can be altered, so focus your attention on the person's nose and chin as these features don't change. When encountering people with beards or facial hair, cover the facial hair portion of the photo and concentrate on the nose or ears.

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- Look at the height and weight. They should reasonably match the person.
- Look at the date of birth and do the math!
- Compare the age on the ID with the person's apparent age.
- Look at the expiration date. If the ID has expired, it is not acceptable.
- If needed, compare the ID to the book of Government Issued ID's

A. Ask

- Ask questions of the person, such as their middle name, zodiac sign, or year of high school graduation. Ask them the month they were born. If they respond with a number, they may be lying. If the person is with a companion, ask the companion to quickly tell you the person's name.
- If you have questions as to their identity, ask the person to sign their name, and then compare signatures.

G. Give Back

- If the ID looks genuine, give the ID back to the customer and allow entry.
- c. If for any reason the identity of the customer or the validity of the ID is in question, the individual will not be granted access to the facility.

VII. Training

CTMN will train all Retail and Security Agents on the verification and identification of individuals. This training will be done prior to Agents performing age verification duties. Management will supply Age Verification Smart ID Scanners and hardcover books to assist Agents in age verification.

All CTMN agents will enroll and complete the Responsible Vendor Training Program when it is available. This curriculum will include:

- a. Diversion prevention and prevention of sales to minors;
- b. Acceptable forms of identification, including:
 - vi. How to check identification;
 - vii. Spotting false identification;
 - viii. Medical registration cards issued by the DPH;
 - ix. Provisions for confiscating fraudulent identifications; and
 - x. Common mistakes made in verification.

Procedures for Quality Control and Testing of Product

Pursuant to 935 CMR 500.160, Cypress Tree Management Natick, Inc. (“CTMN”) will not sell or market any marijuana product that is not capable of being tested by Independent Testing Laboratories, including testing of marijuana products and environmental media. CTMN will implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in DPH protocols identified in 935 CMR 500.160(1) and subsequent notification to the Commission of such results. Results of any tests will be maintained by CTMN for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to CTMN by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). CTMN will never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

In accordance with 935 CMR 500.130(2), CTMN will prepare, handle and store all edible marijuana products in compliance with the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. In addition, CTMN’S policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination.

Pursuant to 935 CMR 500.105(11)(a)-(e), CTMN will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. CTMN will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. CTMN storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The CTMN storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

CTMN will have a Quality Manager who will oversee the manufacturing at the CTMN facility to maintain strict compliance with DPH regulations and protocols for quality control and analytical testing. In accordance with 935 CMR 500.160 CTMN grow areas are monitored for temperature, humidity, and CO2 levels this monitoring helps reduce the risk of crop failure. Ethical pest management procedures are utilized to naturally maintain a pest free environment alongside our True Living Organics (“TLO”) growing method.

All Marijuana Infused Products (“MIPs”) are produced using good manufacturing practices and safe practices for food handling to ensure quality and prevention of contamination.

All CTMN agents whose job includes contact with marijuana or nonedible marijuana products is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. All CTMN agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including personal cleanliness and thorough handwashing. The

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hand-washing facilities will be adequate and convenient with running water at a suitable temperature and conform with all requirements of 935 CMR 500.105(3)(b)(3).

CTMN will provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations, in accordance with 935 CMR 500.105(3)(b)(4). Litter and waste will be properly removed and disposed of and the operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12). The floors, ceilings and walls will be constructed in a way that allows them to be adequately cleaned and in good repair. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9). All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

Pursuant to 935 CMR 500.105(3)(b)(11), CTMN's water supply will be sufficient for necessary operations able to meet our needs. The plumbing requirements of 935 CMR 500.105(3)(b)(12) will be met through adequate size and design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the CTMN facility. CTMN will also provide our employees with adequate, readily accessible toilet facilities that are maintained in sanitary condition and in good repair. All products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms.

Our quality assurance manager will ensure all batches of Marijuana and MIPs will be tested, by an independent testing laboratory pursuant to 935 CMR 500.160. All products shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides.

Environmental media will be tested in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Department of Public Health pursuant to 935 CMR 500.160(1). All testing results will be maintained by CTMN for no less than one year in accordance with 935 CMR 500.160(3).

Samples that pass testing will be packaged for use or utilized in MIPs.

Samples that fail testing will be reported and destroyed. Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.

Qualifications and Training

Pursuant to 935 CMR 500.105(2)(a) Cypress Tree Management Natick, Inc. (“CTMN”) will ensure all dispensary agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Dispensary agents will be trained for one week before acting as a dispensary agent. At a minimum, staff shall receive eight hours of on-going training annually. New dispensary agents will receive employee orientation prior to beginning work with CTMN. Each department managed will provide orientation for dispensary agents assigned to their department. Orientation will include a summary overview of all the training modules.

CTMN relies on its employees to be engaged, compassionate, committed and collaborative. Employees are required to have the applicable skills and qualifications to successfully carry out assigned duties, be prepared to respond appropriately to customer and vendor needs and comply with operational and regulatory requirements. Employees undergo an intensive orientation to introduce the Employee Handbook, Code of Conduct, Emergency Preparedness Guide, Incident Management Protocols and a review of the Commission’s regulations at 935 CMR 500.000 et. seq. Employees are cross-trained within areas they are authorized to access.

Qualifications for CTMN Agents

The minimum requirements to become a CTMN Marijuana Establishment Agent (“Agent”) are outlined below. CMTF board members, directors, employees, executives, managers or volunteers will register with the Commission as a CMTF Marijuana Establishment Agent. For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

Agents must;

- Be 21 years of age or older;
- Have not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and
- Be determined suitable for registration consistent with the provisions of 935CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.

CTMN will develop a job description for all positions with the company. While all Agents must meet the qualifications listed above, many of our positions will require additional qualifications depending on the required duties.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of CTMN that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. CTMN will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention;

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compliance with tracking requirements; identifying acceptable forms of ID; and key state and local laws.

All employees will be registered as agents, in accordance with 935 CMR 500.030. All CTMN employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of CTMN shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in dispensary agents file. Training records will be retrained by CTMN for at least four years after agents' termination. Dispensary agents will have continuous quality training and a minimum of 8 hours annual on-going training.

Record Keeping Procedures

Cypress Tree Management Natick, Inc.'s ("CTMN") records will be available to the Cannabis Control Commission ("CCC") upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures that will be maintained as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual's affiliation with CTMN, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12). Pursuant to 935 CMR 500.105(9), the following business records shall be maintained: assets and liabilities; monetary transactions; books of accounts; sales records, and; salary and wages paid to each employee.

CTMN will also keep all waste disposal records as required by 500.105(12), including record keeping procedures. CTMN will ensure that at least 2 Marijuana Establishment Agents witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12). When the marijuana products or waste is disposed or handled, CTMN will create and maintain a written or electronic record of the date, the type, and quantity disposed or handled, the manner of disposal or other handling, the location of the disposal or other handling, and the names of the Agents present during the disposal or handling, with their signatures. CTMN will keep these records for at least 3 years.

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at the expense of CTMN and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g). In accordance with 935 CMR 500.105(9), records of CTMN will be available for inspection by the Commission upon request. CTMN's records will be maintained in accordance with generally accepted accounting principles. CTMN will have all required written records and available for inspection, including all written operating procedures as required by 935 CMR 500.105(1) and business records as outlined by 935 CMR 500.105(9)(e).

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Separating Recreational from Medical Operations

Cypress Tree Management Natick, Inc. does not intend to operate as a Co-located Marijuana Operation (CMO) at its Natick location. Cypress Tree Management Natick, Inc. at this time will only hold an adult-use retail license.

CYPRESS TREE MANAGEMENT DIVERSITY PLAN

Intent

The intent of Cypress Tree Management, Inc.'s Diversity Plan is to install policies and procedures to promote a diverse workforce. Cypress Tree Management is committed to promote racial and gender equity and include veterans, LGBTQ+, people with disabilities and other communities in the makeup of the workforce.

Purpose

Cypress Tree Management's Diversity Plan serves as a summary of the company's plan to ensure that we are a diverse and inclusive company, promoting a discrimination-free workplace and to encourage all employees to use their individual background and talents to support the growth of the company. Accepting, understanding and valuing the differences amongst our employees gives our company ideas and innovations from a variety of backgrounds and cultures.

Cypress Tree Management's Diversity Plan is meant to be a living document designed to promote strategies as our company grows, guide decisions and practices that impact equity and promote the principles of diversity management.

The Diversity Plan represents the initial approach to establish a comprehensive plan with goals and measures. The Plan will be reevaluated annually or as needed.

Cypress Tree Management will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, branding, marking, and sponsorship practices of every marijuana establishment. Furthermore, any actions taken, or program instituted, by Cypress Tree Management will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Goals

Cypress Tree Management's goals will be measured and tracked at all levels of the company at least annually as follows:

Goal 1: Recruit diverse employees at all levels. Cypress Tree Management will assess the demographic percentages of its workforce annually to see if it is meeting its goal of recruiting diverse employees with a goal of having a workforce that consists of 50% women, 30% minorities, 10% veterans, 10% LGBTQ+ individuals, and 5% individuals with disabilities.

Proposed Initiative: To achieve its goal, Cypress Tree Management will hire staff and post job listings as needed utilizing the following methods:

- Create gender-neutral job descriptions;
- Recruit from state and local employment staffing groups

- Post hiring needs in diverse publications such as a variety of web-based recruitment platforms such as indeed.com;
- Participate in local hiring events and job fairs, at least two annually, including events held by the Massachusetts Cannabis Business Association (MassCBA);

Measurement Frequency and Metrics: Cypress Tree Management will review the diversity of its workforce and compare these metrics to its percentage goals.

The first review will take place within six months of meeting our minimum staffing goals and then annually after that time. Cypress Tree Management will assess and review its progress, submitting a report to the Commission at least 60 days prior to the annual renewal date of our Provisional License. Based upon this annual review and in conjunction with the renewal of its license, Cypress Tree Management will be able to demonstrate to the Commission the success of this initiative.

Goal 2: Ensure that all participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry with a goal of having at least 25% of business in our supply chain and ancillary services owned and/or managed by minority groups, women, veterans, people with disabilities and/or LGBTQ+ individuals.

Proposed Initiative: To accomplish this goal, Cypress Tree Management will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minority groups; women, veterans, people with disabilities, and/or LGBTQ+ individuals. Should advertising for these businesses be required, Cypress Tree Management will utilize the same methods outlined in Goal 1 and adhere to the provisions of 935 CMR 500.105(4).

Measurement Frequency and Metrics: Cypress Tree Management will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by minorities, women, veterans, people with disabilities and/or LGBTQ+ individuals and will calculate the percentage of services and members of its supply chain who meet this requirement. Cypress Tree Management will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the targeted groups and give priority to these businesses. Cypress Tree Management will assess these percentages annually and will be able to demonstrate to the Commission the success of its progress upon the renewal of its license each year to occur one year from provisional licensure.

Conclusion

Cypress Tree Management will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Diversity Plan. Cypress Tree Management will adhere to all requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand,

marketing, and sponsorship practices of marijuana establishments. Any actions taken, or programs instituted by Cypress Tree Management will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.