



# Massachusetts Cannabis Control Commission

## Marijuana Retailer

### General Information:

License Number: MR285396  
Original Issued Date: 04/23/2026  
Issued Date: 04/23/2026  
Expiration Date: 04/23/2027

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Debken Corp.

Phone Number: 617-716-6117 Email Address: rclipof@gmail.com

Business Address 1: 204 North Beacon Street Business Address 2:

Business City: Brighton Business State: MA Business Zip Code: 02135

Mailing Address 1: 6 Dogwood Road Mailing Address 2:

Mailing City: Weston Mailing State: MA Mailing Zip Code: 02493

## 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?:

If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 51 Percentage Of Control: 51

Role: Owner / Partner Other Role:

First Name: Deborah Last Name: Stevens Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 49

Percentage Of Control: 49

Role: Owner / Partner

Other Role:

First Name: Kenneth

Last Name: Stevens

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:

Percentage Of Control:

Role: Manager

Other Role:

First Name: Matthew

Last Name: Stevens

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Deborah

Last Name: Stevens

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$100000 Percentage of Initial Capital: 100

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Kenneth

Last Name: Stevens

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$100000 Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 204 North Beacon Street

Establishment Address 2:

Establishment City: Boston

Establishment Zip Code: 02135

Approximate square footage of the establishment: 4000

How many abutters does this property have?:

152

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 |
|--|---|------|--------------------------|-------------|
| Executed HCA                               | 204 N Beacon Host Agreement_Executed with First Amendment.pdf | pdf  | 682636c76cf3645b62f99646 | 05/15/2025  |
| Plan to Remain Compliant with Local Zoning | Debken_Plan to Remain Compliant with Local Zoning.pdf         | pdf  | 68279b7b6cf3645b62fac138 | 05/16/2025  |
| Executed HCA                               | Debken Corp 2025 2nd Amendment HCA fully executed.pdf         | pdf  | 690210411cb95ddffb7ba213 | 10/29/2025  |
| Community Outreach Meeting Documentation   | Debken_COM Materials.pdf                                      | pdf  | 694437d9251dfef3386804f8 | 12/18/2025  |

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

**POSITIVE IMPACT PLAN**

Positive Impact Plan:

| Document Category        | Document Name                   | Type | ID                       | Upload Date |
|--------------------------|---------------------------------|------|--------------------------|-------------|
| Plan for Positive Impact | Debken_Positive Impact Plan.pdf | pdf  | 692d982e78e4c85baa01f878 | 12/01/2025  |

**ADDITIONAL INFORMATION NOTIFICATION**

Notification:

**INDIVIDUAL BACKGROUND INFORMATION**

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Deborah

Last Name: Stevens Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: Kenneth

Last Name: Stevens Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Executive / Officer

Other Role:

First Name: Matthew

Last Name: Stevens Suffix:

RMD Association: Not associated with an RMD

Background Question: no

### ENTITY BACKGROUND CHECK INFORMATION

No records found

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

| Document Category  | Document Name  | Type | ID                       | Upload Date |
|--|--|------|--------------------------|-------------|
| Bylaws   | Debken Bylaws.pdf  | pdf  | 67f6e01cd80aaa0db44a36d6 | 04/09/2025  |
| Articles of Organization   | Debken_Articles of Organization.pdf                          | pdf  | 67f6e021d80aaa0db44a36ea | 04/09/2025  |
| Secretary of Commonwealth - Certificate of Good Standing             | Debken_SoC CoGS_3.26.25.pdf                                  | pdf  | 67f6e040d80aaa0db44a3701 | 04/09/2025  |
| Department of Unemployment Assistance - Certificate of Good standing | Debken_DUA Cert of Good Standing Attestation.pdf             | pdf  | 6824b838e70def4ec02045b7 | 05/14/2025  |
| Department of Revenue - Certificate of Good standing                 | Debken Cert of Good Standing and Tax Compliance Oct 2025.pdf | pdf  | 6902125f1cb95ddffb7ba48e | 10/29/2025  |

No documents uploaded

Massachusetts Business Identification Number: 001542451

Doing-Business-As Name:

DBA Registration City:

### BUSINESS PLAN

Business Plan Documentation:

| Document Category                                | Document Name                                     | Type | ID                       | Upload Date |
|--|---|------|--------------------------|-------------|
| Operating Agreement or Articles of Incorporation | Debken_Articles of Organization.pdf               | pdf  | 67f6e1763b8f2e45c6eb9fde | 04/09/2025  |
| Operating Agreement or Articles of Incorporation | Debken Bylaws.pdf                                 | pdf  | 67f6e17ed80aaa0db44a3884 | 04/09/2025  |
| Business Plan                                    | Debken_Business Plan.pdf                          | pdf  | 68279bb56cf3645b62fac1d6 | 05/16/2025  |
| Proposed Timeline                                | Debken_Proposed Timeline.pdf                      | pdf  | 68279bbd6cf3645b62fac1ea | 05/16/2025  |
| Plan for Liability Insurance                     | Debken_Plan for Obtaining Liability Insurance.pdf | pdf  | 68279bc86cf3645b62fac1fe | 05/16/2025  |
| Capitalization Table                             | Debken_Cap Table.pdf                              | pdf  | 68279d3c2309ac25e352252f | 05/16/2025  |

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

| Document Category                                  | Document Name                           | Type | ID                       | Upload Date |
|--|---|------|--------------------------|-------------|
| Plan for obtaining marijuana or marijuana products | Debken_Plan for Obtaining Marijuana.pdf | pdf  | 68279d652309ac25e3522579 | 05/16/2025  |
| Restricting Access to age 21 and older             | Debken_Plan for Restricting             | pdf  | 68279d772309ac25e3522590 | 05/16/2025  |

|  | Access.pdf                               |     |                          |            |
|--|--|-----|--------------------------|------------|
| Security plan                                  | Debken_Security Plan.pdf                 | pdf | 68279d832309ac25e35225aa | 05/16/2025 |
| Prevention of diversion                        | Debken_Prevention of Diversion.pdf       | pdf | 68279d912309ac25e35225be | 05/16/2025 |
| Storage of marijuana                           | Debken_Storage of Marijuana.pdf          | pdf | 68279d9c2309ac25e35225d2 | 05/16/2025 |
| Transportation of marijuana                    | Debken_Transportation of Marijuana.pdf   | pdf | 68279da52309ac25e35225e6 | 05/16/2025 |
| Inventory procedures                           | Debken_Inventory Procedures.pdf          | pdf | 68279db32309ac25e35225fa | 05/16/2025 |
| Quality control and testing                    | Debken_Quality Control and Testing.pdf   | pdf | 68279dbe2309ac25e3522614 | 05/16/2025 |
| Dispensing procedures                          | Debken_Dispensing Procedures.pdf         | pdf | 68279dc72309ac25e3522628 | 05/16/2025 |
| Personnel policies including background checks | Debken_Personnel Policies.pdf            | pdf | 68279dd12309ac25e352263c | 05/16/2025 |
| Record Keeping procedures                      | Debken_Recordkeeping Procedures.pdf      | pdf | 68279ddc2309ac25e3522650 | 05/16/2025 |
| Maintaining of financial records               | Debken_Maintaining Financial Records.pdf | pdf | 68279de82309ac25e3522664 | 05/16/2025 |
| Qualifications and training                    | Debken_Qualifications and Training.pdf   | pdf | 68279df12309ac25e3522678 | 05/16/2025 |
| Energy Compliance Plan                         | Debken_Energy Compliance Plan.pdf        | pdf | 68279dfc2309ac25e3522692 | 05/16/2025 |
| Diversity plan                                 | Debken_Diversity Plan.pdf                | pdf | 692d988178e4c85baa01f975 | 12/01/2025 |

#### 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

Date generated: 05/12/2026

Page: 5 of 6

**Notification:**

**COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024**

No records found

**COMPLIANCE WITH DIVERSITY PLAN**

No records found

**HOURS OF OPERATION**

|                                 |                              |
|---------------------------------|------------------------------|
| <b>Monday From: 10:00 AM</b>    | <b>Monday To: 7:00 PM</b>    |
| <b>Tuesday From: 10:00 AM</b>   | <b>Tuesday To: 7:00 PM</b>   |
| <b>Wednesday From: 10:00 AM</b> | <b>Wednesday To: 7:00 PM</b> |
| <b>Thursday From: 10:00 AM</b>  | <b>Thursday To: 7:00 PM</b>  |
| <b>Friday From: 10:00 AM</b>    | <b>Friday To: 7:00 PM</b>    |
| <b>Saturday From: 10:00 AM</b>  | <b>Saturday To: 7:00 PM</b>  |
| <b>Sunday From: 10:00 AM</b>    | <b>Sunday To: 7:00 PM</b>    |

## PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Debken Corp. (“Debken”) will remain compliant at all times with the local zoning requirements set forth in the City of Boston’s Zoning Code. In accordance with Boston’s Zoning Code, Debken’s proposed Marijuana Retailer is located in the Commercial Zoning District, where Retail Cannabis Establishments are allowed via Conditional Use Permit.

Pursuant to Boston’s Zoning Code, the property is not located within 500 feet from a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12. Distances are determined from the nearest lot line of the proposed establishment to the nearest lot line of an existing establishment or school.

As required by Boston’s Zoning Ordinance, Debken holds a Conditional Use Permit from the Zoning Board of Appeal, which included [navigating the application and Host Community Agreement processes](#) with the Inspectional Services Department and Boston Cannabis Board respectively. Debken will renew its local license annually pursuant to the requirements of the [Boston Cannabis Board’s Rules and Regulations](#).

Debken will apply for any other local permits required to operate a Marijuana Retailer at the proposed location. Debken will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Retailer at Debken’s proposed location.

Debken has already attended several meetings with various municipal officials and boards to discuss Debken’s plans for a proposed Marijuana Retailer and has executed a Host Community Agreement with the City of Boston. Debken will [continue to work cooperatively](#) with various municipal departments, boards, and officials to ensure that Debken’s Marijuana Retailer remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

1. The Community Outreach Meeting was held on the following date(s): April 9, 2025
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

- a. Date of publication:
- b. Name of publication:

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

- a. Date notice filed:

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

- a. Date notice(s) mailed:

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

- a. The type(s) of ME or MTC to be located at the proposed address;
- b. Information adequate to demonstrate that the location will be maintained securely;
- c. Steps to be taken by the ME or MTC to prevent diversion to minors;
- d. A plan by the ME or MTC to positively impact the community; and
- e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Debken Corp.

Name of applicant's authorized representative:

Kenneth Stevens

Signature of applicant's authorized representative:

*Kenneth Stevens*



**Debken Corp. Community Outreach Meeting**  
**April 9, 2025**

Please copy and paste the following link to the meeting if simply clicking on it does not navigate appropriately:

<https://us02web.zoom.us/rec/share/hkrhbgJWF5KTtltxITHuJylj8EtoTpJiHANX5LOqV2uE9S8CGdLEhPcsyKekHGD-.opqbM9gqB1RpiDeO>

Passcode: u#C77v^=

Number of Participants: 12

**From:** Jasmin Winn <jasmin.winn@boston.gov>  
**Sent:** Thursday, December 18, 2025 11:31 AM  
**To:** Rebecca Rutenberg <r.rutenberg@vicentellp.com>  
**Cc:** Bridgette Nikisher <b.nikisher@vicentellp.com>; Philip Silverman <p.silverman@vicentellp.com>; cannabisboard@boston.gov  
**Subject:** Re: [cannabisboard] Notice of Community Outreach Meeting

Hi Rebecca

The BCB was satisfied that Debken Corp. held the community outreach meeting virtually.

Best,  
Jasmin

On Tue, Dec 16, 2025 at 1:59 PM Rebecca Rutenberg <[r.rutenberg@vicentellp.com](mailto:r.rutenberg@vicentellp.com)> wrote:

Jasmin -

I hope you are well. Can you please confirm that the BCB was comfortable that Debken Corp. held the community outreach meeting corresponded on below virtually? The CCC has asked for confirmation.

Thanks!

**Becca Rutenberg**

Senior Vice President,  
Eastern Markets + Business Intelligence

**Vicente.15 Years.**

p 617.934.2121 m 610.675.5958

e [r.rutenberg@vicentellp.com](mailto:r.rutenberg@vicentellp.com)

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**From:** Jasmin Winn <[jasmin.winn@boston.gov](mailto:jasmin.winn@boston.gov)>

**Date:** Wednesday, March 19, 2025 at 10:16 AM

**To:** Bridgette Nikisher <[b.nikisher@vicentellp.com](mailto:b.nikisher@vicentellp.com)>

**Cc:** [cannabisboard@boston.gov](mailto:cannabisboard@boston.gov) <[cannabisboard@boston.gov](mailto:cannabisboard@boston.gov)>, Rebecca Rutenberg <[r.rutenberg@vicentellp.com](mailto:r.rutenberg@vicentellp.com)>

**Subject:** Re: [cannabisboard] Notice of Community Outreach Meeting

 External email >

Great. Thank you

On Wed, Mar 19, 2025 at 10:15 AM 'Bridgette Nikisher' via Cannabis Board <[cannabisboard@boston.gov](mailto:cannabisboard@boston.gov)> wrote:

Hi,

Yes, that is correct.

Thanks!

**Bridgette Nikisher**

Strategic Affairs Specialist  
she / her / hers

Cell: 914-483-8836  
Office: 917-398-0685

[B.Nikisher@VicenteLLP.com](mailto:B.Nikisher@VicenteLLP.com)

**Vicente.**

1115 Broadway, Suite 1218  
New York, NY 10010

Serving clients from [offices nationwide](#)

*Bridgette Nikisher is not a licensed attorney, nothing herein should be construed as legal advice.*

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**From:** Jasmin Winn <[jasmin.winn@boston.gov](mailto:jasmin.winn@boston.gov)>  
**Sent:** Wednesday, March 19, 2025 10:09 AM  
**To:** Bridgette Nikisher <[b.nikisher@vicentellp.com](mailto:b.nikisher@vicentellp.com)>  
**Cc:** [cannabisboard@boston.gov](mailto:cannabisboard@boston.gov)  
**Subject:** Re: [cannabisboard] Notice of Community Outreach Meeting

Hi Bridgette

Is this meeting to satisfy the CCC's 6 month community meeting requirement?

Thanks  
Jasmin

On Tue, Mar 18, 2025 at 2:37 PM 'Bridgette Nikisher' via Cannabis Board  
<[cannabisboard@boston.gov](mailto:cannabisboard@boston.gov)> wrote:

Hi,

Attached, please find notice of a community outreach meeting. Please do not hesitate to reach out with any questions.

Best,  
**Bridgette Nikisher**  
Strategic Affairs Specialist  
she / her / hers

Cell: 914-483-8836  
Office: 917-398-0685  
[B.Nikisher@VicenteLLP.com](mailto:B.Nikisher@VicenteLLP.com)

**Vicente.**

1115 Broadway, Suite 1218  
New York, NY 10010

Serving clients from [offices nationwide](#)

*Bridgette Nikisher is not a licensed attorney, nothing herein should be construed as legal advice.*

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*Jasmin Winn*

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Cannabis Board Manager | [Boston Cannabis Board](#) | 617•635•2330 | 1 City Hall Square,  
Room 809, Boston, MA 02201

SIGN UP FOR PERIODIC UPDATES FROM THE BOSTON CANNABIS BOARD [HERE](#).  
Please note: This is a City of Boston email account and the content of this message is public record.

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*Jasmin Winn*

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Cannabis Board Manager | [Boston Cannabis Board](#) | 617•635•2330 | 1 City Hall Square, Room 809, Boston, MA 02201

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SIGN UP FOR PERIODIC UPDATES FROM THE BOSTON CANNABIS BOARD [HERE](#).  
Please note: This is a City of Boston email account and the content of this message is public record.

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*Jasmin Winn*

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Cannabis Board Manager | [Boston Cannabis Board](#) | 617•635•2330 | 1 City Hall Square, Room 809, Boston, MA 02201

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SIGN UP FOR PERIODIC UPDATES FROM THE BOSTON CANNABIS BOARD [HERE](#).  
Please note: This is a City of Boston email account and the content of this message is public record.

**Upcoming Vacation December 18th - January 5, 2026**

Begin forwarded message:

**From:** CCC Licensing <licensing@cccmass.com>  
**Subject: RE: Host Meetings Online**  
**Date:** February 10, 2025 at 9:45:05 AM EST  
**To:**  
**Cc:** CCC Licensing <licensing@cccmass.com>, Matt Giancola <Matt.Giancola@cccmass.com>, Jessica Porter <Jessica.Porter@cccmass.com>

Good morning,

I am following up on the email below regarding virtual Community Outreach Meetings.

Please note that the previous email was sent in error, and virtual Community Outreach Meetings are permitted by the Commission. Please also see the [Guidance on Licensure](#), which has further information on the requirements for Community Outreach Meetings.

We apologize for any confusion, but please feel free to reach out if you have any further questions.

Kind regards and have a great day!



**Brendan, Licensing Specialist**  
Enforcement Department/Licensing  
Pronouns: He/Him  
Cannabis Control Commission  
Union Station  
2 Washington Square  
Worcester, MA 01604  
[Licensing@CCCMass.com](mailto:Licensing@CCCMass.com)  
[www.MassCannabisControl.com](http://www.MassCannabisControl.com)



Considering applying for a Marijuana Establishment or Medical Marijuana Treatment Center license? This is a great place to start: [Guidance on Licensure](#).

*Please consider all email communications sent to or received by the Cannabis Control Commission (Commission) to be a matter of public record. Commission emails may be disclosed in response to a request made pursuant to the Public Records Law, G. L. c. 66, §10 and G. L. c. 4, § 7, cl. 26, or in response to other compulsory legal process.*

**From:** CCC Licensing <[licensing@cccmass.com](mailto:licensing@cccmass.com)>  
**Sent:** Wednesday, February 5, 2025 2:57 PM  
**To:**  
**Cc:** CCC Licensing <[licensing@cccmass.com](mailto:licensing@cccmass.com)>  
**Subject:** RE: Host Meetings Online

Good afternoon,

Thank you for your email.

The [Administrative Order](#) allowing Virtual Community Outreach Meetings expired on December 31, 2023. This means that, at this time, the Commission cannot accept Virtual Community Outreach Meetings. However, we are discussing the possibility of extending acceptance of Virtual Community Outreach Meetings. Please consider attending the Commission's [public meetings](#) to keep up to date on this discussion.

Please let us know if we can assist further.

Kind regards and have a great day!



**Brendan**, *Licensing Specialist*  
Enforcement Department/Licensing  
Pronouns: He/Him  
Cannabis Control Commission  
Union Station  
2 Washington Square  
Worcester, MA 01604  
[Licensing@CCCMass.com](mailto:Licensing@CCCMass.com)  
[www.MassCannabisControl.com](http://www.MassCannabisControl.com)



Considering applying for a Marijuana Establishment or Medical Marijuana Treatment Center license? This is a great place to start: [Guidance on Licensure](#).

*Please consider all email communications sent to or received by the Cannabis Control Commission (Commission) to be a matter of public record. Commission emails may be disclosed in response to a request made pursuant to the Public Records Law, G. L. c. 66, §10 and G. L. c. 4, § 7, cl. 26, or in response to other compulsory legal process.*

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# NASA wants Boeing as SpaceX alternative

By Julie Johnsson and Sana Pashankar  
BLOOMBERG NEWS

After NASA's marooned astronauts arrived home in a SpaceX capsule this week, the agency was quick to chart a costly and test-intensive future for the very vehicle that had left the crew trapped in space in the first place.

Boeing Co.'s Starliner is undergoing analysis and upgrades, a test campaign slated for this summer and at least one additional demonstration flight that could cost \$400 million or more — all to prove it's a viable alternative to Elon Musk's Dragon capsule for getting Americans to orbit.

"We're working hand-in-hand with Boeing as well on certification of Starliner, getting that vehicle back to flight," Steve Stich, program manager for NASA's commercial crew, told reporters on Tuesday evening.

The return of NASA astronauts Butch Wilmore and Suni Williams on SpaceX's Dragon capsule "shows how important it



CHRIS O'MEARA/ASSOCIATED PRESS

**Boeing's Starliner launched last June, carrying Butch Wilmore and Suni Williams to the International Space Station.**

is to have two different crew transportation systems," Stich added.

His comments were the most bullish in months about the troubled Boeing program. But a question he and other NASA officials stopped short of answering Tuesday is who would foot the bill for such an extensive test campaign, or even the extent of the company's commitment.

A Boeing spokeswoman declined to comment on Stich's remarks or elaborate on its plans for Starliner.

Bloomberg has reported that the US planemaker was weighing options for the money-losing program as chief executive Kelly Ortberg looks to prune businesses that are either too niche or have little chance of being commercially viable. As a new leader

brought in to get the US manufacturing champion back on track after years of turmoil, Ortberg has free rein to make sweeping changes, including potentially scuttling the initiative.

Ortberg's portfolio review followed years of technical glitches, setbacks, and more than \$1.8 billion in cost overruns with Starliner, offering reasons to doubt the program's future in Boeing's lineup. Then came the botched June mission that left Williams and Wilmore stuck at the ISS for nine months rather than the planned few days.

But on Tuesday, Stich pointed to the work Boeing is doing to get to the root of Starliner's previous issues as evidence that the company is still committed to the program. "Boeing, up to their new CEO Kelly, has been committed to Starliner," Stich said.

Boeing is addressing problems that cropped up during the flight, including with helium leaks and glitch-prone thrusters that are used to position the craft during flight, NASA officials said on Tuesday.

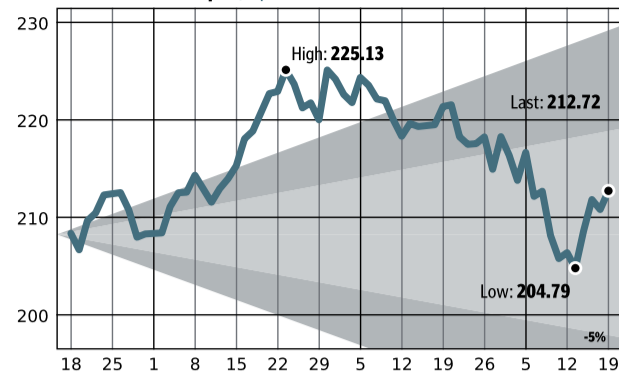
## THE BOSTON GLOBE

# 25

Index of publicly traded companies in Massachusetts

### Globe 25 index

Total market cap: \$1,305.1b



Yesterday 212.72 ▲ 1.92 ▲ 0.9% ▲ YTD 2.1%

|                                    | Price  | Chg    | % chg | Market cap (bil.) |
|------------------------------------|--------|--------|-------|-------------------|
| Thermo Fisher Scientific Inc (TMO) | 518.41 | -3.09  | -0.6  | 195.6             |
| Boston Scientific Corp (BSX)       | 100.73 | +1.51  | +1.5  | 148.7             |
| TJX Cos Inc/The (TJX)              | 117.86 | +2.60  | +2.3  | 132.5             |
| Vertex Pharmaceuticals Inc (VRTX)  | 512.52 | +0.29  | +0.1  | 131.6             |
| Analog Devices Inc (ADI)           | 209.97 | +0.81  | +0.4  | 104.1             |
| American Tower Corp (AMT)          | 213.76 | -1.11  | -0.5  | 99.9              |
| GE Vernova Inc (GEV)               | 335.80 | +16.87 | +5.3  | 92.6              |
| Keurig Dr Pepper Inc (KDP)         | 33.47  | -0.12  | -0.4  | 45.4              |
| Alnylam Pharmaceuticals Inc (ALNY) | 253.44 | +9.14  | +3.7  | 33.0              |
| HubSpot Inc (HUBS)                 | 604.77 | +7.81  | +1.3  | 31.5              |
| Iron Mountain Inc (IRM)            | 88.61  | +0.99  | +1.1  | 26.0              |
| State Street Corp (STT)            | 90.21  | +2.10  | +2.4  | 26.0              |
| Veralto Corp (VLTO)                | 99.26  | +0.90  | +0.9  | 24.6              |
| Eversource Energy (ES)             | 61.50  | -0.40  | -0.6  | 22.6              |
| Waters Corp (WAT)                  | 371.34 | -10.81 | -2.8  | 22.1              |
| Biogen Inc (BIIB)                  | 141.43 | -1.66  | -1.2  | 20.7              |
| Toast Inc (TOST)                   | 35.10  | +1.31  | +3.9  | 20.2              |
| PTC Inc (PTC)                      | 161.24 | +1.22  | +0.8  | 19.4              |
| DraftKings Inc (DKNG)              | 38.54  | +1.63  | +4.4  | 18.9              |
| Insulet Corp (PODD)                | 265.82 | +5.35  | +2.1  | 18.7              |
| Entegris Inc (ENTG)                | 100.37 | +0.22  | +0.2  | 15.2              |
| Dynatrace Inc (DT)                 | 49.48  | +0.32  | +0.7  | 14.8              |
| Teradyne Inc (TER)                 | 88.51  | -0.36  | -0.4  | 14.3              |
| Hologic Inc (HOLX)                 | 61.47  | -0.51  | -0.8  | 13.9              |
| Moderna Inc (MRNA)                 | 33.32  | -0.49  | -1.4  | 12.9              |

# Fed sees tariffs raising inflation, keeps key rate unchanged

**FEDERAL RESERVE**  
Continued from Page D1  
spending and lift the economy.

It is the second meeting in a row that the Fed has kept its interest rate at about 4.3 percent

as the central bank has moved to the sidelines as it evaluates the impact of the Trump administration's policies on the economy. Economists forecast that tariffs will likely push up infla-

tion, at least temporarily. But other policies, such as deregulation, could lower costs and cool inflation.

Powell acknowledged that many surveys of businesses and

consumers have shown rising concern about the economic outlook. Yet he noted that the unemployment rate remains low and the economy is still expanding.

"We do understand that sentiment has fallen off pretty sharply but economic activity has not yet," Powell said. "The economy seems to be healthy."

Powell underscored that uncertainty around the economy's outlook is "unusually elevated" and said that the Fed is prepared to be patient and see how the economy evolves before making further moves.

"We're not going to be in any hurry to move," he said. "We're well positioned to wait for further clarity and not in any hurry."

The Fed also said it would slow the rate at which it is reducing its Treasury holdings, which grew massively during and after the pandemic. Previously it had allowed \$25 billion of Treasury securities to mature each month without reinvesting the proceeds. Now it will allow only \$5 billion to mature each month.

In effect, the Fed will be reinvesting more of the expiring bonds into new securities, which should keep interest rates on long-term Treasuries lower than they would have been otherwise. Powell characterized the change as a technical one and not related to its interest-rate policies. Yields fell slightly in Treasury markets.

Federal Reserve governor Christopher Waller voted against the decision to slow the Treasury purchases. The Fed is still allowing \$35 billion of mortgage-backed securities to mature each month.

So far, growth appears to be slowing in the first three months of the year but the impact of tariffs on inflation hasn't yet materialized. But economists at Goldman Sachs forecast that the import taxes will push inflation to 3 percent by the end of this year.

Fed officials are closely watching measures of Americans' inflation expectations, which spiked in one survey released just last week. Inflation expectations — essentially a measure of how worried people are that inflation will get worse — are important to the Fed because they can be self-fulfilling. If people expect higher inflation, they may take steps, such as accelerating purchases, that can push prices higher.

Retailers of both high-end and lower-cost goods have warned that consumers are turning more cautious as they expect prices to rise because of tariffs. Retail sales rose modestly last month after a sharp fall in January. Homebuilders and contractors expect that home construction and renovations will get more expensive.

Many economists have sharply reduced their forecasts for growth this year, with Barclays, a bank, now forecasting growth of just 0.7 percent, down from 2.5 percent in 2024. And economists at Goldman Sachs now expect inflation — excluding the volatile food and energy categories — will tick higher to 3 percent by the end of this year, up from its current level of 2.6 percent.

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**LEGAL NOTICES** **LEGAL NOTICES**

**LEGAL NOTICE**  
The Massachusetts Regional Transit Authority (MART) invites qualified contractors to submit responses for: RFR 03-13-25 Install Bollards at Intermodal Transportation Center (ITC) 100 Main St., Fitchburg MA.

Contractors are invited to obtain the Request for Response document which outlines the instructions and format for responses by accessing our website at <http://www.mrtia.us/doing-business/contracting-opportunities> or contacting [procurement@mrtia.us](mailto:procurement@mrtia.us). Responses will be accepted until 4pm on Tuesday, April 8, 2025 and should be sent via email to [procurement@mrtia.us](mailto:procurement@mrtia.us) OR hand delivered or Mailed to MART at 142R Water Street, Fitchburg, MA 01420 Attn: Procurement. Proposals received after the date and time specified above will be considered late. MART reserves the right to accept or to reject any and/or all responses.

The award under this solicitation is subject to funding from Federal Transit Administration and Massachusetts Department of Transportation. Successful Bids are subject to the following conditions: and no proposal will be subject to discrimination based on race, color, national origin, gender, age, or disability. The successful proponent will be required to comply with federal and state regulations including Equal Employment Opportunity and the Americans with Disabilities Act.

**NOTICE OF A PUBLIC HEARING**  
Removal of Public Shade Trees  
City of Waltham, Consolidated Public Works

Pursuant to Massachusetts General Laws Chapter 87, Sections 3 and 4, a public hearing will be held on Friday, March 28, 2025 at 10:00 am at 167 Lexington St, Waltham, MA, to consider the removal of the following public tree(s):

Elson Road: 11" Norway maple, 9" Norway maple, 11" Locust, 27" Black oak, 15" Red oak, 16" Cork tree. All trees are in the way of road and walkway improvements.

The tree(s) identified above have been posted for public inspection. Any objections to their removal must be submitted in writing to the City Tree Warden, prior to or during the hearing. Anonymous letters will not be considered. The mailing address for the City Tree Warden is: CPW Department, Forestry Division, City of Waltham, 167 Lexington Street, Waltham, MA 02452-4638; phone: 781-314-3850 email: [kthompson@city.waltham.ma.us](mailto:kthompson@city.waltham.ma.us)

**Notice of Community Outreach Meeting**  
Notice is hereby given that Deben Corp. will hold a Virtual Community Outreach Meeting on April 9, 2025 at 5:00 PM to discuss the operation of an adult-use marijuana retailer at 204 N Beacon St. Boston MA 02135. A copy of the presentation will be made available at least 24 hours prior to the meeting by emailing [r.rutenberg@vicentelp.com](mailto:r.rutenberg@vicentelp.com), <https://us02web.zoom.us/j/81972424506> | Dial in: 1-646-558-6566 | Webinar ID: 81972424506

**CITY OF QUINCY AND QUINCY HOME CONSORTIUM**  
2025-2030 CONSOLIDATED PLAN & FFY 2025 ANNUAL ACTION PLAN

On or before May 16, 2025, the City of Quincy and the Quincy HOME Consortium will submit to the U.S. Dept. of Housing and Urban Dev. its 2025-2030 Consolidated Plan & FFY 2025 (beginning 7/1/25) Annual Action Plan for the Community Development Block Grant, HOME, and Emergency Solutions Grant Programs. The plan includes a summary of proposed projects; an estimate of anticipated resources; the identification of programs that provide decent housing, a suitable living environment and expanded economic opportunities, primarily for low and moderate-income persons. A draft of this plan will be available for public review online at [tinyurl.com/2zp99mb7](http://tinyurl.com/2zp99mb7) from 3/31/2025 through 5/2/2025. A public hearing on the needs assessment related to the plan will be held at 2:00pm on 3/27/2025 at 34 Coddington Street, Quincy. All comments on the plan must be received in writing and are due by 12:00pm on 5/2/2025 to the attention of Sean Glennon, C.D. Director, at [sean@quincyma.gov](mailto:sean@quincyma.gov), or via mail at 34 Coddington St., 3rd Floor, Quincy, MA 02269. In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during this hearing should notify Kate Tenney via e-mail at [ktenney@quincyma.gov](mailto:ktenney@quincyma.gov), or via phone at 617-376-1055 at least 48 hours prior to the hearing.

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## LEGAL NOTICES

### LEGAL NOTICE

**MORTGAGEE'S SALE OF REAL ESTATE**  
By virtue of and in execution of the Power of Sale contained in a certain mortgage given by Amy Clark, Trustee of the Double Threes Realty Trust u/d/t dated January 30, 2020 to Mortgage Electronic Registration Systems, Inc., as mortgagee, as nominee for Athas Capital Group, Inc., its successors and assigns, dated February 25, 2021 and recorded in Norfolk County Registry of Deeds in Book 39055, Page 320 (the "Mortgage") of which mortgage Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as Owner Trustee for CSMC 2021-NQM7 is the present holder by Assignment from Mortgage Electronic Registration Systems, Inc., as mortgagee, acting solely as a nominee for Athas Capital Group, Inc. to Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as Owner Trustee for CSMC 2021-NQM7 dated March 6, 2023 and recorded at said Registry of Deeds in Book 41091, Page 265, for breach of conditions of said mortgage and for the purpose of foreclosing the same, the mortgaged premises located at 33 Oakland Road, Brookline, MA 02445 will be sold at a Public Auction at 10:00 AM on April 17, 2025, at the mortgaged premises, more particularly described below, all and singular the premises described in said mortgage, to wit:

The land in and rights on land in said Brookline with the buildings thereon now known and numbered as 33 Oakland Road, Brookline and bounded and described as follows:

First Parcel: A parcel of land with the buildings thereon being the lot marked A on a plan of Land in Brookline, Massachusetts, dated March 14, 1916 by Henry F. Bryant, Engineer, and recorded with Norfolk Deeds, Book 1337; Page 239, and bounded and described as follows:

- NORTHWESTERLY by a part of the four foot strip hereinafter described, fifty-five and 81/100 (55.81) feet;
- NORTHEASTERLY by a land now or formerly of Rosa Gould, fifty (50) Feet;
- SOUTHEASTERLY by land now or formerly of Albert Geiger, Jr., et al., Trustees, fifty-four (54) feet; and
- SOUTHWESTERLY by land now or formerly of Eliza G. Rice, et al., forty-eight and 78/100 (48.78) feet;

Said land is conveyed and subject to the following restrictions:

No building or erection shall be placed on said land except a dwelling house for not more than two families and said dwelling house be covered with a material called stucco.

Also, a strip of land four feet wide being the lot marked B on said plan, bounded and described as follows:

- NORTHEASTERLY on a private way as shown on said plan, four (4) feet;
- NORTHWESTERLY by a line running through the six foot passageway shown on said plan, about one hundred forty-two and 07/100 (142.07) feet;
- SOUTHWESTERLY by land now or formerly of Rice et al., four (4) feet;
- SOUTHEASTERLY by land now or formerly of Rice et al, by lot A above mentioned and by land now or formerly of Rosa Gould as shown on said plan, in all one hundred forty-one and 81/100 (141.81) feet;

Second Parcel: A parcel of land situated in Brookline being the lot shown on a Plan of Land in Brookline, Massachusetts, dated January 29, 1919 by Henry F. Bryant, Engineer, and recorded with Norfolk Deeds, Book 1415; Page 1, and bounded and described as follows:

- NORTHWESTERLY by land now or formerly of M.H. And H.L. Mahoney and land now or formerly of Hington, one hundred forty-three and 10/100 (143.10) feet;
- SOUTHWESTERLY by land now or formerly of Rice et al., three and 90/100 (3.90) feet;
- SOUTHEASTERLY by a passageway four (4) feet wide, about one hundred forty-two and 7/100 (142.07) feet;
- NORTHEASTERLY by a private way, seventeen and 49/100 (17.49) feet;

Third Parcel: A right of way in and over a certain parcel of land in said Brookline shown on a "Plan Showing Proposed Passageways", Brookline, Mass., April 15, 1916, by Henry F. Bryant, Engineer, recorded with Norfolk Deeds, Book 1339, Page 183, and bounded and described as follows:

- SOUTHEASTERLY by the northwesterly line of a six foot passageway as shown on said plan, fifty (50) feet;
- NORTHEASTERLY by land now or formerly of Annie Vogel, seventeen (17) feet;
- NORTHWESTERLY by land now or formerly of Annie Vogel and land now or formerly of Emily T. Vogel, fifty (50) feet;
- SOUTHWESTERLY by land now or formerly of Annie Vogel and Emily T. Vogel, seventeen (17) feet, all as shown on said plan.

Fourth Parcel: A certain parcel of land situated in said Brookline adjoining the First Parcel above described and being a portion of Lots 3 and 4 as appear on a Plan of Aspinwall and Lincoln dated June 23, 1903, and recorded with Norfolk Deeds, Plan Book 36, Plan 1666, and bounded and described as follows:

- NORTHEASTERLY by land now or formerly of George H.B. Murray, forty-eight and 78/100 (48.78) feet;
- SOUTHEASTERLY by land now or formerly of Ann B. Murray, six (6) feet;
- SOUTHWESTERLY by land now or formerly of said Ann B. Murray, forty-eight and 78/100 (48.78) feet; and
- NORTHWESTERLY by land now or formerly of Emily T. Vogel, six (6) feet.

Meaning and intending to describe and convey the premises conveyed by deed dated February 4, 2020 and recorded with the Norfolk County Registry of Deeds in Book 37576, Page 562.

See deed in Book 37576, Page 562.

For mortgagor's title see deed recorded with the Norfolk County Registry of Deeds in Book 37576, Page 562.

The premises will be sold subject to any and all unpaid taxes and other municipal assessments and liens, and subject to prior liens or other enforceable encumbrances of record entitled to precedence over this mortgage, and subject to and with the benefit of all easements, restrictions, reservations and conditions of record and subject to all tenancies and/or rights of parties in possession.

Terms of the Sale: Cashier's or certified check in the sum of \$10,000.00 as a deposit must be shown at the time and place of the sale in order to qualify as a bidder (the mortgage holder and its designee(s) are exempt from this requirement); high bidder to sign written Memorandum of Sale upon acceptance of bid; balance of purchase price payable by certified check in thirty (30) days from the date of the sale at the offices of mortgagee's attorney, Korde & Associates, P.C., 900 Chelmsford Street, Suite 3102, Lowell, MA or such other time as may be designated by mortgagee. The description for the premises contained in said mortgage shall control in the event of a typographical error in this publication.

Other terms to be announced at the sale.  
Wilmington Savings Fund Society, FSB, not in its individual capacity, but solely as Owner Trustee for CSMC 2021-NQM7  
Prospective bidders should contact the auctioneer, Paul E. Saperstein Co., 144 Centre Street, Holbrook, MA 02343-1011, (617) 227-6553 or [www.pesco.com](http://www.pesco.com) for further information.

Korde & Associates, P.C.  
900 Chelmsford Street  
Suite 3102  
Lowell, MA 01851  
(978) 256-1500  
Trustee Of Double Threes, Amy Clark, 23-042045

**NOTICE OF COMMUNITY OUTREACH MEETING**

Notice is hereby given that Debken Corp. will hold a Virtual Community Outreach Meeting on **April 9, 2025** at 5:00 PM to discuss the operation of an adult-use marijuana retailer at 204 N Beacon St, Boston MA 02135.

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

Members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed operations. Questions can be submitted in advance by emailing [r.rutenberg@vicentellp.com](mailto:r.rutenberg@vicentellp.com) or asked during the meeting.

Join Zoom Meeting: <https://us02web.zoom.us/j/81972424506>  
Telephone Dial In: +1 6465588656 | Webinar ID: 819 7242 4506

**From:** [Bridgette Nikisher](#)  
**To:** [cannabisboard@boston.gov](mailto:cannabisboard@boston.gov)  
**Subject:** Notice of Community Outreach Meeting  
**Date:** Tuesday, March 18, 2025 2:34:00 PM  
**Attachments:** [Debken Corp - Notice of Community Outreach Meeting.pdf](#)  
[image001.png](#)

---

Hi,

Attached, please find notice of a community outreach meeting. Please do not hesitate to reach out with any questions.

Best,

**Bridgette Nikisher**  
Strategic Affairs Specialist  
she / her / hers

Cell: 914-483-8836  
Office: 917-398-0685  
[B.Nikisher@VicenteLLP.com](mailto:B.Nikisher@VicenteLLP.com)

**Vicente.**

1115 Broadway, Suite 1218  
New York, NY 10010

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*Bridgette Nikisher is not a licensed attorney, nothing herein should be construed as legal advice.*

**From:** [Bridgette Nikisher](#)  
**To:** [cityclerk@boston.gov](mailto:cityclerk@boston.gov); [publicnotice@boston.gov](mailto:publicnotice@boston.gov)  
**Subject:** Notice of Community Outreach Meeting  
**Date:** Tuesday, March 18, 2025 2:34:00 PM  
**Attachments:** [Debken Corp - Notice of Community Outreach Meeting.pdf](#)  
[image001.png](#)

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**Bridgette Nikisher**  
Strategic Affairs Specialist  
she / her / hers

Cell: 914-483-8836  
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**Vicente.**

1115 Broadway, Suite 1218  
New York, NY 10010

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*Bridgette Nikisher is not a licensed attorney, nothing herein should be construed as legal advice.*

**From:** [Bridgette Nikisher](#)  
**To:** [michelle.wu@boston.gov](mailto:michelle.wu@boston.gov); [311@boston.gov](mailto:311@boston.gov)  
**Subject:** Notice of Community Outreach Meeting  
**Date:** Tuesday, March 18, 2025 2:32:00 PM  
**Attachments:** [Debken Corp - Notice of Community Outreach Meeting.pdf](#)  
[image001.png](#)

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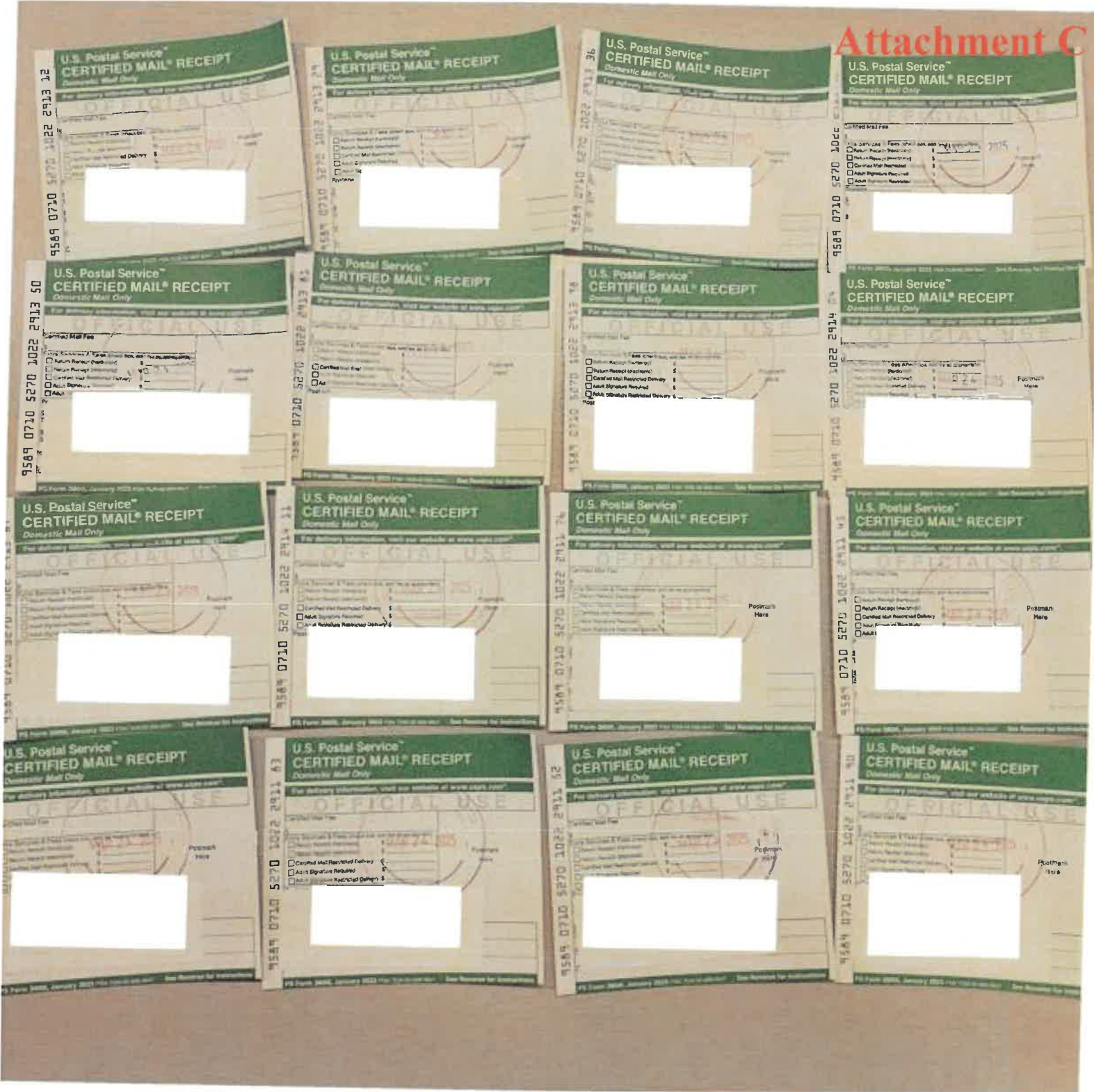
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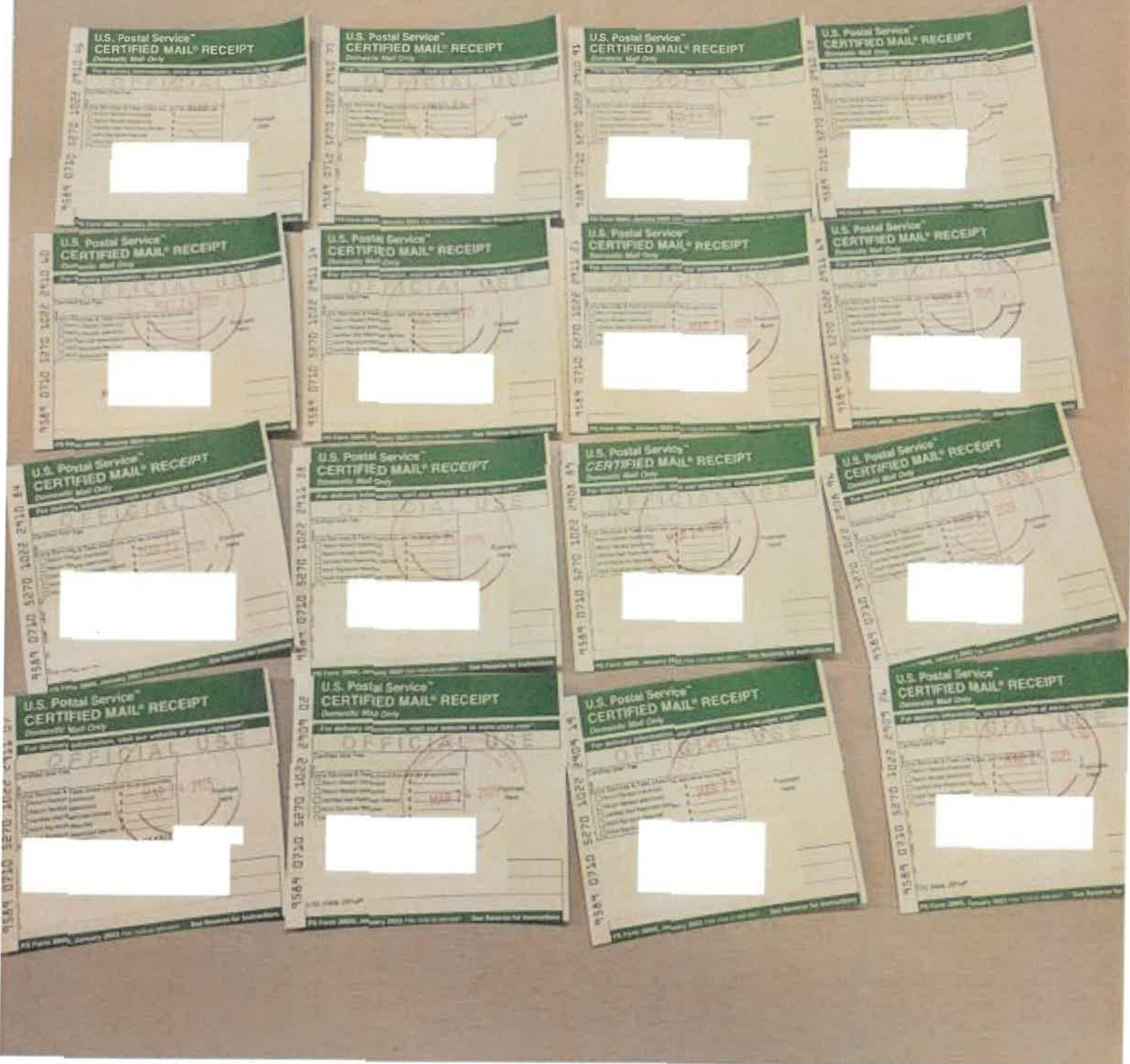
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# Attachment C





# Attachment C







# Attachment C

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## PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

In an effort to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities, this plan has been developed to benefit Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have drug convictions.

Debken Corp. (“Debken” or the “Company”) believes that one of the best ways it, as an employer in the community, can help residents who have past drug convictions is to extend opportunities to people reentering the workforce after completing their sentences. While most employers are not willing to provide people with criminal records a chance to earn a living, Debken believes that providing second chances is a great way to benefit people with criminal records and the community at large.

Debken understands that workers with past drug convictions, and workers with parents or spouses who have drug convictions can add value to the company. Debken believes this because:

- These workers have served their time.
- They work extremely hard.
- They are typically local.
- This is an opportunity for the Company to provide a rare opportunity.

### GOALS

As an applicant applying for any Marijuana Establishment license, and to provide community benefits and positively impact disproportionately impacted communities, the primary goals and objectives of Debken’s plan are to:

- Focus the hiring practices and efforts to work to employ 30% of workers with past drug convictions or workers with parents or spouses who have drug convictions.<sup>1</sup>
- Implement a mentorship program whereby Debken will provide ongoing advancement and management training occurring annually to at least one (1) employee per year who has a past drug conviction or whose parents or spouses have past drug convictions.

### PROGRAMS

Debken’s Employment First Program (which will be implemented as hiring needs arise, but not less than annually) will ensure that its hiring practices FIRST seek to employ workers with past drug convictions, and workers with parents or spouses who have drug convictions; and to provide promotions and advanced responsibility for these workers by promoting from within the Company when at all possible. To this end, Debken will host annual job fairs in areas within 30 miles of the marijuana establishment. Additionally, Debken will post hiring opportunities with appropriate organizations like [FelonyRecordHub.com](https://www.felonyrecordhub.com). Debken will hold post hiring opportunities every time Debken needs to hire from outside the company (but not less than annually).

In addition to its outreach efforts for the hiring of Massachusetts residents with past drug convictions (or their parents or spouses), Debken will develop a mentorship program specifically tailored to its employees who have past drug convictions in order to support their continued growth in the cannabis

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<sup>1</sup> Debken will ensure that any hiring practices instituted with respect to Massachusetts residents who have past drug convictions or Massachusetts residents with parents or spouses who have drug convictions are done in accordance with “Ban the Box” standards.

industry.<sup>2</sup> Interested employees will submit a letter of interest to the Community Impact Committee, along with an attestation regarding whether they qualify (i.e. if they are a Massachusetts resident with a past drug conviction or if they have a parent or spouse who has a drug conviction). The Community Impact Committee will then identify any qualified employees before conducting a blind selection process. Every year, at least one such employee will be selected and will undergo skills development and/or management training, which will include topics like marijuana retailer business management.

## **MEASUREMENTS**

In an effort to properly assess the progress and success of Debken's effort to promote and encourage full participation in the regulated cannabis industry by Massachusetts residents with past drug convictions, and with parents or spouses who have drug convictions, Debken will measure the progress and success of this plan. Debken's Community Impact Committee will review and evaluate Debken's measurable outcomes no less than annually to ensure that Debken is meeting its commitments. Debken is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Debken's efforts to implement, monitor and measure this plan will be governed by its Community Impact Committee that will document the following measurements when evaluating compliance with this Plan.

- Completing an employee demographic survey to ensure that Debken's hiring goals are being met;
- Documenting all job fairs hosted or participated in, including any advertisements, posts, or recordkeeping concerning participants;
- Implementing recordkeeping for the mentorship program including documenting participants, training materials, and relevant logs for training.

Beginning upon receipt of Debken's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, Debken will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license.

## **ACKNOWLEDGEMENTS**

Debken affirmatively states the following:

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

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<sup>2</sup> Please note that this mentorship program is separate and apart from the one discussed in Debken's Diversity Plan.

**BYLAWS  
OF DEBKEN CORP.  
A MASSACHUSETTS CORPORATION  
(THE “CORPORATION”)**

**ADOPTED ON NOVEMBER [3], 2021**

**ARTICLE I  
SHAREHOLDERS**

**Section 1.01 Meetings of the Shareholders.** Any meeting of the shareholders shall be held at any time and place or solely by means of remote communications (in accordance with Section 7.08 of the Massachusetts Business Corporation Act<sup>i</sup> (the “MBCA”)) and may be called by the board of directors of the Corporation (the “Board of Directors”). Special meetings of the shareholders for any purpose may be called by the Board of Directors and also by the Chief Executive Officer, President, or by the holders of at least 10 per cent the outstanding shares entitled to vote at an election of directors; *provided, however*, that only business within the purpose described in the applicable notice may be conducted at such special meeting. Any meeting of the shareholders may be adjourned from time to time by the persons calling such meeting. A notice of any meeting or any adjourned meeting shall be in sent by the Corporation in accordance with the Section 7.05 of the MBCA<sup>ii</sup>. Any shareholder may waive such notice in accordance with Section 7.06 of the MBCA<sup>iii</sup>.

**Section 1.02 Quorum; Action by the Shareholders.** At each meeting of the shareholders a quorum shall be required to take any vote on an action. Except as otherwise required by the Articles of Organization, the MBCA, or agreements among the shareholders and the Corporation, at each meeting of the shareholders, a majority of the outstanding shares entitled to vote on the matter, present in person or represented by proxy, shall constitute a quorum for such matter. A quorum, once established at a meeting, shall not be broken by the subsequent withdrawal of an amount of such shares entitled to vote to leave less than a quorum. If a quorum is not established at any meeting of the shareholders, such meeting shall be adjourned until a quorum shall be present or represented. When a quorum is established at any meeting, any action (other than the election of directors) to be voted upon by the shareholders at such meeting shall be decided by the vote of the holders of a majority of the outstanding shares entitled to vote on such matter except where the Articles of Organization, the MBCA, agreements among the shareholders and the Corporation, or these Bylaws require otherwise.

**Section 1.03 Meeting Procedures; Voting.** The Corporation shall prepare a complete list of shareholders entitled to vote at each meeting of the shareholders in accordance with Sections 7.07<sup>iv</sup> and 7.20<sup>v</sup> of the MBCA. The Board of Directors may adopt by resolution such rules and regulations for the conduct of any meeting of the shareholders as it shall deem appropriate, including who may preside over such meeting. Unless otherwise provided in the Articles of Organization, each shareholder shall be entitled to one vote for each outstanding share of the Corporation held by such shareholder. Each shareholder entitled to vote may appoint a proxy to vote or otherwise act for such shareholder in accordance with Section 7.22 of the MBCA<sup>vi</sup>.

**Section 1.04 Action by the Shareholders Without a Meeting.** Pursuant to and subject to compliance with Section 7.04 of the MBCA<sup>vii</sup>, whenever shareholders are required or permitted to take any action at a meeting of the shareholders, such action may be taken without a meeting, without prior notice and without a vote, if one or more written consents, describing the action taken, shall be signed by the holders of outstanding shares having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting.

## **ARTICLE II DIRECTORS**

**Section 2.01 Power; Number; Qualifications.** Subject to the Articles of Organization, the MBCA, agreements among the shareholders and the Corporation, and these Bylaws, the business and affairs of the Corporation shall be managed by and under the direction of the Board of Directors. Unless otherwise provided in the Articles of Organization, the number of directors which shall constitute the entire Board of Directors shall be determined from time to time by resolution of the Board of Directors or by the holders of a majority of the outstanding shares entitled to vote at an election of directors; *provided* that no decrease in the number of directors shall shorten the term of any incumbent director. Directors shall be subject to the requirements and qualifications set forth in the Articles of Organization and shall not otherwise be required to be shareholders.

**Section 2.02 Election; Term of Office.** An annual meeting of the shareholders shall be held for the election of directors on a date and at a time determined by the Board of Directors. The failure to hold an annual meeting at the time stated in or fixed in accordance with these Bylaws shall not affect the validity of any corporate action. Each director shall hold office until a successor is duly elected or appointed and qualified or until such director's earlier death, resignation, disqualification, or removal.

**Section 2.03 Resignation; Removal.** Any director of the Corporation may resign at any time upon written notice of such director's resignation to the Corporation and such resignation shall take effect at the date of receipt by the Corporation, or the time or upon the occurrence of the event specified therein. Except as otherwise required by the Articles of Organization or by applicable law, any director of the Corporation may be removed, with or without cause, by the holders of a majority of the outstanding shares entitled to vote at an election of directors.

**Section 2.04 Vacancies.** Except as otherwise provided by the Articles of Organization, or agreements among the shareholders and the Corporation, any vacancy or newly created directorship may be filled by a majority vote of the directors then in office, though less than a quorum, and each director so appointed shall hold office until the next annual election and until a successor is duly elected or appointed and qualified or until such director's earlier death, resignation, disqualification, or removal; *provided, however*, that if such vacancy occurs among the directors elected or appointed by the holders of a class or series of shares, or newly created directorship was created by the holders of a majority of the outstanding shares entitled to vote at an election of directors, then the applicable the holders of such shares may supersede the Board of Directors' appointment and fill such vacancy or newly created directorship.

**Section 2.05 Fees.** Directors may receive a fee for their services as directors and out-of-pocket expenses actually and reasonably incurred in attending any meeting of the Board of Directors pursuant to policies and procedures of the Corporation. Nothing herein shall preclude any director from serving the Corporation in any other capacity and receiving compensation for such services.

**Section 2.06 Meetings of the Board of Directors.** Meetings of the Board of Directors may be held without notice at such time and at any place or by means of remote communications (in accordance with Section 9.20(b) of the MBCA<sup>viii</sup>) and may be called by the Board of Directors. Meetings of the Board of Directors may also be called by the Chief Executive Officer or the President upon 2 days' notice of the date, time and place of such meeting by the Corporation to the directors. Notice of any other meeting or any adjourned meeting of the Board of Directors may, but is not required to, be given by the Corporation. Any director may waive such notice in accordance with Section 8.23 of the MBCA<sup>ix</sup>.

**Section 2.07 Quorum; Action by the Board of Directors.** At each meeting of the Board of Directors a quorum shall be required to take any vote or action or to transact any business. Except as otherwise required by the Articles of Organization, the MBCA, or agreements among the shareholders and the Corporation, at each meeting of the Board of Directors, a majority of the entire Board of Directors shall constitute a quorum. A quorum, once established at a meeting, shall not be broken by the subsequent withdrawal of directors to leave less than a quorum. If a quorum is not established at any meeting of the Board of Directors, such meeting shall be adjourned until a quorum shall be present. When a quorum is present when a vote is taken, the affirmative vote of a majority of directors present is the act of the Board of Directors unless the Articles of Organization, the MBCA agreements among the shareholders and the Corporation, or these Bylaws require otherwise.

**Section 2.08 Meeting Procedures.** The Board of Directors may adopt such rules and regulations for the conduct of any meeting of the Board of Directors as it shall deem appropriate, including who may chair such meeting.

**Section 2.09 Action by the Board of Directors Without a Meeting.** Pursuant to and subject to compliance with Section 8.21 of the MBCA<sup>x</sup>, any action required or permitted to be taken by the Board of Directors or any committee thereof may be taken without a meeting if the action is taken by the unanimous written consent of the entire Board of Directors or the committee to the adoption of a resolution authorizing the action.

**Section 2.10 Committees.** Pursuant to and subject to compliance with Section 8.25 of the MBCA<sup>xi</sup>, the Board of Directors may create committees, each consisting of one or more directors, and may designate one or more directors as alternate members of any such committee. Any such committee, to the extent permitted by the MBCA and to the extent provided in the applicable resolution of the Board of Directors, shall have and may exercise all the powers and authority of the Board of Directors in the management and direction of the business and affairs of the Corporation and each committee shall conduct itself in the same manner as the Board of Directors conducts itself pursuant to this Article II.

## **ARTICLE III OFFICERS**

**Section 3.01 Officers; Power; Qualification.** The Board of Directors shall elect or appoint one or more officers of the Corporation, including a president, a treasurer and a secretary. The Board of Directors may from time to time elect or appoint such additional officers (including to fill any vacancies) as it may determine, and any two or more offices may be held by the same person. The powers and duties of the officers shall be those required by the MBCA and such other powers and duties as usually pertain to such office and as the Board of Directors may from time to time determine. Officers shall be subject to the requirements and qualifications set forth in the Articles of Organization and shall not be required to be shareholders.

**Section 3.02 Term of Office.** Each officer shall hold office for such term as shall be determined by the Board of Directors and until such officer's successor has been duly elected or appointed and qualified or until such officer's earlier death, resignation, disqualification, or removal.

**Section 3.03 Resignation; Removal.** Any officer of the Corporation may resign at any time upon written notice of such officer's resignation to the Corporation and such resignation shall take effect at the date of receipt by the Corporation, or the time or upon the occurrence of the event specified therein. Except as otherwise required by the Articles of Organization or by applicable law, any officer may be removed or have such officer's authority suspended, with or without cause, by a majority vote of the Board of Directors.

**Section 3.04 Compensation.** The compensation of each officer (if any) shall be determined by the Board of Directors. Nothing herein shall preclude any officer from serving the Corporation in any other capacity and receiving compensation for such services.

## **ARTICLE IV SHARES**

**Section 4.01 Certificate of Shares.** The shares of the Corporation may be certificated or uncertificated, as provided under the MBCA, and shall be entered in the books of the Corporation and recorded as such shares are issued. If any shares are represented by certificates, such certificates shall be in the form in accordance with the MBCA and otherwise approved by the Board of Directors. The Corporation may issue a new certificate of stock in place of any previously issued certificate alleged to have been lost, stolen or destroyed, and may impose additional terms and conditions permitted by the MBCA.

**Section 4.02 Transfers of Shares.** Subject to any restrictions on transfer, shares of the Corporation shall be transferable on the books of the Corporation by the holder thereof, in person or by duly authorized attorney, and, if applicable, upon the surrender of the certificate representing the shares to be transferred, properly endorsed or accompanied by a written assignment or power of attorney properly executed. Except as otherwise provided by applicable law, the Corporation shall be entitled to treat the holder of record of any share as the owner thereof for all purposes until such shares have been transferred on the books of the Corporation in accordance with applicable requirements.

**Section 4.03 Regulations.** The Corporation, to the extent permitted by applicable law, shall have power to make all rules and regulations and to impose terms and conditions concerning the issue, transfer, conversion, redemption and registration of any shares of stock of the Corporation.

## **ARTICLE V MISCELLANEOUS**

**Section 5.01 Fiscal Year.** The fiscal year of the Corporation shall be the calendar year unless otherwise determined by the Board of Directors.

**Section 5.02 MCBA.** All references herein to a specific section of the MCBA shall refer to such section as of the date these Bylaws were adopted by the Corporation and shall also refer to any lawful successor provision to the extent required by applicable law. In the event of any conflict between the provisions of these Bylaws and the provisions of the MCBA, such provisions of the MCBA shall control to extent required by applicable law.

**Section 5.03 Form of Records.** All books and records of the Corporation may be electronic in accordance with Section 16.01 of the MBCA<sup>xii</sup>.

**Section 5.04 Electronic Transmission.** Without limiting the manner by which notices or consents may be given hereunder, any such notice or consent may be given by electronic transmission in accordance with applicable law and if given by such electronic transmission shall be deemed to be given in writing for all purposes hereunder.

**Section 5.05 Amendment of Bylaws.** These Bylaws may be amended or repealed, and new Bylaws may be adopted, by resolution of the Board of Directors or by the holders of a majority of the outstanding shares entitled to vote at an election of directors; *provided*, that (i) the Board of Directors may not amend or repeal any provision of these Bylaws which by the Articles of Organization, the MBCA or these Bylaws requires action by the shareholders and (ii) any amendment or repeal of these Bylaws by the Board of Directors and any new Bylaw adopted by the Board of Directors may be amended or repealed by the shareholders.

Appendix A  
Text of the MBCA

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i

Section 7.08. Meetings by Remote Communications; Remote Participation in Meetings shareholder

Unless otherwise provided in the articles of organization or bylaws, if authorized by the board of directors: any annual or special meeting of shareholders need not be held at any place but may instead be held solely by means of remote communication, unless the corporation is a public corporation; and subject to such guidelines and procedures as the board of directors may adopt, shareholders and proxyholders not physically present at a meeting of shareholders may, by means of remote communications:

- (1) participate in a meeting of shareholders; and
- (2) be deemed present in person and vote at a meeting of shareholders whether such meeting is to be held at a designated place or solely by means of remote communication, provided that:
  - (i) the corporation shall implement reasonable measures to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder;
  - (ii) the corporation shall implement reasonable measures to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings; and
  - (iii) if any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, a record of such vote or other action shall be maintained by the corporation.

ii

Section 7.05. Notice of Meeting

(a) A written notice of the date, time, and place of each annual and special shareholders' meeting describing the purposes of the meeting shall be given to shareholders no fewer than 7 nor more than 60 days before the meeting date. Unless this chapter or the articles of organization require otherwise, the corporation is required to give notice only to shareholders entitled to vote at the meeting.

(b) Unless the bylaws require otherwise, if an annual or special meeting of shareholders is adjourned to a different date, time or place, notice need not be given of the new date, time or place if the new date, time or place, if any, is announced at the meeting before adjournment. If a new record date for the adjourned meeting is or shall be fixed under section 7.07, however, notice of the adjourned meeting shall be given under this section to persons who are shareholders as of the new record date.

iii

Section 7.06. Waiver of Notice

(a) A shareholder may waive any notice required by this chapter, the articles of organization, or the bylaws before or after the date and time stated in the notice. The waiver shall be in writing, be signed by the shareholder entitled to the notice, and be delivered to the corporation for inclusion with the records of the meeting.

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(b) A shareholder's attendance at a meeting:

(1) waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting; and

(2) waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

iv

#### Section 7.07. Record Date

(a) Except as otherwise provided in section 7.03, the bylaws may fix or provide the manner of fixing the record date for one or more voting groups in order to determine the shareholders entitled to notice of a shareholders' meeting, to demand a special meeting, to vote, or to take any other action. If the bylaws do not fix or provide for fixing a record date, the board of directors of the corporation may fix a future date as the record date. If a record date for a specific action is not fixed by the bylaws or the board of directors, and is not supplied by the section of this chapter dealing with that action, the record date shall be the close of business either on the day before the first notice is sent to shareholders, or, if no notice is sent, on the day before the meeting.

(b) A record date fixed under this section may not be more than 70 days before the meeting or action requiring a determination of shareholders.

(c) A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the board of directors fixes a new record date, which it shall do if the meeting is adjourned to a date more than 120 days after the date fixed for the original meeting.

(d) If a court orders a meeting adjourned to a date more than 120 days after the date fixed for the original meeting, it may provide that the original record date continues in effect or it may fix a new record date.

v

#### Section 7.20. Shareholders List for Meeting

(a) After fixing a record date for a shareholders' meeting, a corporation shall prepare an alphabetical list of the names of all its shareholders who are entitled to notice of the meeting. The list shall be arranged by voting group, and within each voting group by class or series of shares, and show the address of and number of shares held by each shareholder, but need not include an electronic mail address or other electronic contact information for any shareholder.

(b) The shareholders list shall be available for inspection by any shareholder, beginning 2 business days after notice is given of the meeting for which the list was prepared and continuing through the meeting:

(1) at the corporation's principal office or at a place identified in the meeting notice in the city where the meeting will be held; or

(2) 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.

If the meeting is to be held solely by means of remote communication, the list shall be made available on an electronic network. In the event the corporation determines or is required to make the list available on an electronic network, the corporation may take reasonable steps to ensure that such information is available only to shareholders of the corporation.

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(c) A shareholder, his agent, or attorney is entitled on written demand to inspect and, subject to the requirements of section 16.02(c), to copy the list, during regular business hours and at his expense, during the period it is available for inspection.

(d) The corporation shall make the shareholders list available at the meeting, and any shareholder or his agent or attorney is entitled to inspect the list at any time during the meeting or any adjournment.

(e) If the corporation refuses to allow a shareholder or his agent or attorney to inspect the shareholders list before or at the meeting, or copy the list as permitted by subsection (b), the superior court of the county where a corporation's principal office or, if none in the commonwealth, its registered office is located, on application of the shareholder, may summarily order the inspection or copying at the corporation's expense and may postpone the meeting for which the list was prepared until the inspection or copying is complete.

(f) Refusal or failure to prepare or make available the shareholders list shall not affect the validity of action taken at the meeting.

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## Section 7.22. Proxies

(a) A shareholder may vote his shares in person or by proxy.

(b) A shareholder may appoint a proxy to vote or otherwise act for him by signing an appointment form, either personally or by his attorney-in-fact.

(c) An appointment of a proxy is effective when received by the secretary or other officer or agent authorized to tabulate votes. Unless otherwise provided in the appointment form, an appointment is valid for a period of 11 months from the date the shareholder signed the form or, if it is undated, from the date of its receipt by the officer or agent, or for such shorter period as may be specified in the bylaws.

(d) An appointment of a proxy is revocable by the shareholder unless the appointment form conspicuously states that it is irrevocable and the appointment is coupled with an interest. Appointments coupled with an interest include, without limitation, the appointment of:

- (1) a secured party;
- (2) a person who purchased or agreed to purchase the shares;
- (3) a creditor of the corporation who extended it credit under terms requiring the appointment;
- (4) an employee of the corporation whose employment contract requires the appointment; or
- (5) a party to a voting agreement created under section 7.31.

(e) The death or incapacity of the shareholder appointing a proxy shall not affect the right of the corporation to accept the proxy's authority unless notice of the death or incapacity is received by the secretary or other officer or agent authorized to tabulate votes before the proxy exercises his authority under the appointment.

(f) An appointment made irrevocable under subsection (d) is revoked when the interest with which it is coupled is extinguished.

(g) A transferee for value of shares subject to an irrevocable appointment may revoke the appointment if he did not know of its existence when he acquired the shares and the existence of the irrevocable appointment was not noted conspicuously on the certificate representing the shares or on the information statement for shares without certificates.

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(h) Subject to section 7.24 and to any express limitation on the proxy's authority appearing on the face of the appointment form, a corporation is entitled to accept the proxy's vote or other action as that of the shareholder making the appointment.

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#### Section 7.04. Action Without Meeting

(a) Action required or permitted by this chapter to be taken at a shareholders' meeting may be taken without a meeting if the action is taken either: (1) by all shareholders entitled to vote on the action; or (2) to the extent permitted by the articles of organization, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by 1 or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the corporation as required by this section.

(b) If not otherwise fixed under section 7.03 or 7.07, the record date for determining shareholders entitled to take action without a meeting is the date the first shareholder signs the consent under subsection (a).

(c) A consent signed under this section has the effect of a vote at a meeting and may be described as such in any document, except that if action is taken by the consent of less than all shareholders entitled to vote on the action, any document required to be filed under this chapter with respect to such action shall state that the action was taken by consent of the required number of shareholders and that any required notice has been given to other shareholders.

(d) If action is to be taken pursuant to the consent of voting shareholders without a meeting, the corporation, at least 7 days before the action pursuant to the consent is taken, shall give notice, which complies in form with the requirements of section 7.05, of the action (1) to nonvoting shareholders in any case where this chapter would require such notice if the action is to be taken pursuant to a vote by voting shareholders at a meeting, and (2) if the action is to be taken pursuant to the consent of less than all the shareholders entitled to vote on the matter, to all shareholders entitled to vote who did not consent to the action. The notice shall contain, or be accompanied by, the same material that, under this chapter, would have been required to be sent to shareholders in or with the notice of a meeting at which the action would have been submitted to the shareholders for approval.

viii

#### Section 8.20. Meetings

...

(b) Unless the articles of organization or bylaws provide otherwise, the board of directors may permit any or all directors to participate in a regular or special meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by this means is considered to be present in person at the meeting.

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#### Section 8.23. Waiver of Notice

(a) A director may waive any notice required by this chapter, the articles of organization or the bylaws before or after the date and time of the meeting. Except as provided by subsection (b), the waiver shall be in writing, signed by the director entitled to the notice, or in the form of an electronic transmission by the director to the corporation, and filed with the minutes or corporate records.

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(b) A director's attendance at or participation in a meeting waives any required notice to him of the meeting unless the director at the beginning of the meeting, or promptly upon his arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

x

#### Section 8.21. Action Without Meeting

(a) Unless the articles of organization or bylaws provide that action required or permitted by this chapter to be taken by the directors may be taken only at a meeting, the action may be taken without a meeting if the action is taken by the unanimous consent of the members of the board of directors. The action must be evidenced by 1 or more consents describing the action taken, in writing, signed by each director, or delivered to the corporation by electronic transmission, to the address specified by the corporation for the purpose or, if no address has been specified, to the principal office of the corporation, addressed to the secretary or other officer or agent having custody of the records of proceedings of directors, and included in the minutes or filed with the corporate records reflecting the action taken.

(b) Action taken under this section is effective when the last director signs or delivers the consent, unless the consent specifies a different effective date.

(c) A consent signed or delivered under this section has the effect of a meeting vote and may be described as such in any document.

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#### Section 8.25. Committees

(a) Unless the articles of organization or bylaws provide otherwise, a board of directors may create 1 or more committees and appoint members of the board of directors to serve on them. Each committee may have 1 or more members, who serve at the pleasure of the board of directors.

(b) The creation of a committee and appointment of members to it must be approved by the greater of: (1) a majority of all the directors in office when the action is taken; or (2) the number of directors required by the articles of organization or bylaws to take action under section 8.24.

(c) Sections 8.20 through 8.24, which govern meetings, action without meetings, notice and waiver of notice, and quorum and voting requirements of the board of directors, shall apply to committees and their members.

(d) To the extent specified by the board of directors or in the articles of organization or bylaws, each committee may exercise the authority of the board of directors under section 8.01.

(e) A committee may not, however:

- (1) authorize distributions;
- (2) approve or propose to shareholders action that this chapter requires be approved by shareholders;
- (3) change the number of the board of directors, remove directors from office or fill vacancies on the board of directors;
- (4) amend articles of organization pursuant to section 10.02;
- (5) adopt, amend or repeal bylaws; or
- (6) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the board of directors.

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(f) The creation of, delegation of authority to, or action by a committee does not alone constitute compliance by a director with the standards of conduct described in section 8.30.

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Section 16.01. Corporate Records

...

(d) A corporation shall maintain its records in written form or in another form capable of conversion into written form within a reasonable time.  
shareholder



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$250.00

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

**Articles of Organization**

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

Identification Number: 001542451

**ARTICLE I**

The exact name of the corporation is:

DEBKEN CORP.

**ARTICLE II**

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

TO APPLY FOR MARIJUANA ESTABLISHMENT LICENSES FROM THE CANNABIS CONTROL COMMISSION PURSUANT TO M.G.L. C. 94G.

**ARTICLE III**

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

| Class of Stock | Par Value Per Share<br>Enter 0 if no Par | Total Authorized by Articles<br>of Organization or Amendments |                 | Total Issued<br>and Outstanding<br>Num of Shares |
|----------------|--|---|-----------------|--|
|                |  | Num of Shares   | Total Par Value |  |
| CWP            | \$0.00010                                | 100   | \$0.01          | 100  |

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

**ARTICLE IV**

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

**ARTICLE V**

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

**ARTICLE VI**

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

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

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

#### ARTICLE VII

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

**Later Effective Date: Time:**

## ARTICLE VIII

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

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

Name: KENNETH STEVENS  
No. and Street: 6 DOGWOOD ROAD  
City or Town: WESTON State: MA Zip: 02493 Country: USA

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

| Title     | Individual Name<br>First, Middle, Last, Suffix | Address (no PO Box)<br>Address, City or Town, State, Zip Code |
|-----------|--|---|
| PRESIDENT | DEBORAH STEVENS                                | 6 DOGWOOD ROAD<br>WESTON, MA 02493 USA                        |
| TREASURER | KENNETH STEVENS                                | 6 DOGWOOD ROAD<br>WESTON, MA 02493 USA                        |
| SECRETARY | DEBORAH STEVENS                                | 6 DOGWOOD ROAD<br>WESTON, MA 02493 USA                        |
| DIRECTOR  | DEBORAH STEVENS                                | 6 DOGWOOD ROAD<br>WESTON, MA 02493 USA                        |
| DIRECTOR  | KENNETH STEVENS                                | 6 DOGWOOD ROAD<br>WESTON, MA 02493 USA                        |

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

December

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

APPLYING FOR A LICENSE FROM THE CCC

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

No. and Street: 6 DOGWOOD ROAD  
City or Town: WESTON State: MA Zip: 02493 Country: USA

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

No. and Street: 6 DOGWOOD ROAD  
City or Town: WESTON State: MA Zip: 02493 Country: USA

**which is**

its principal office  an office of its transfer agent  
 an office of its secretary/assistant secretary  its registered office

**Signed this 5 Day of November, 2021 at 11:54:44 AM by the incorporator(s).** (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

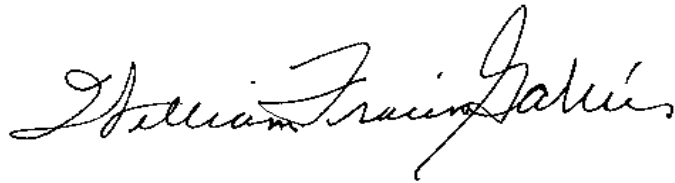
KENNETH STEVENS

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All Rights Reserved

THE COMMONWEALTH OF MASSACHUSETTS

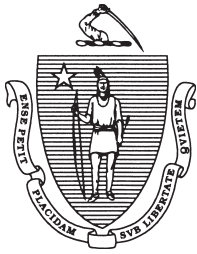
I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with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

November 05, 2021 11:53 AM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: March 26, 2025

To Whom It May Concern :

I hereby certify that according to the records of this office,  
**DEBKEN CORP.**

is a domestic corporation organized on **November 05, 2021** , 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: 25030506510

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

Processed by: qle



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



DEBKEN CORP  
204 NORTH BEACON ST #  
BRIGHTON MA 02135-2027

000062

### *Why did I receive this notice?*

The Commissioner of Revenue certifies that, as of the date of this certificate, DEBKEN CORP 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, Monday through Friday, 9:00 a.m. to 4:00 p.m.

### *Visit us online!*

Visit [mass.gov/dor](http://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

### **Mission Statement**

Debken Corp. (“Debken”) is an applicant for a Marijuana Retailer Establishment License in the Commonwealth that is committed to creating a safe and clean community environment and that provides consistent, high-quality cannabis to consumers who are 21 years of age or older.

### **What Drives Us**

Debken’s goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of Debken’s operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Marijuana Establishment.

## **COMPANY DESCRIPTION**

### **Structure**

Debken is a Massachusetts domestic for-profit corporation that is applying for Licenses from the Commission to operate a Marijuana Retailer Establishment at 204 North Beacon Street, Brighton, MA 02135.

Debken will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment.

### **Operations**

Debken will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of finished, stored marijuana; conduct a monthly inventory of finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

Debken will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Debken will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

Debken will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, Debken will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Debken will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

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

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

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

Prior to commencing operations, Debken will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of Debken. If Debken is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless Debken has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

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

### **Security**

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

Debken's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

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

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

All agents and visitors will be required to visibly display an ID badge, and Debken will maintain a current list of individuals with access. Debken will have security personnel on-site during business hours.

On-site consumption of marijuana by Debken's employees and visitors will be prohibited.

### **Benefits to Host Communities**

Debken looks forward to working cooperatively with its host community to ensure that Debken operates as a responsible, contributing member to the City of Boston. Debken has established a mutually beneficial relationship with Boston in exchange for permitting Debken to site and operate.

The City of Boston stands to benefit in various ways, including but not limited to the following:

1. **Jobs**: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. **Monetary Benefits**: A Host Community Agreement will offset costs imposed on the City of Boston by Debken's operations in conformance with the requirements of laws and regulations governing Host Community Agreements.
3. **Access to Quality Product**: Debken will allow qualified consumers in the Commonwealth to have access to high-quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
4. **Control**: In addition to the Commission, the Police Department and other municipal departments will have oversight over Debken's security systems and processes.
5. **Responsibility**: Debken is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. **Economic Development**: Debken's operation of its facility will help to revitalize its host communities and contribute to the overall economic development of the local community.

## **MARKET RESEARCH**

### **Customers**

Debken will only sell marijuana and marijuana products to customers ages 21 years and older that provide valid identification.

### **Competitors**

Debken's competitors primarily include other Marijuana Retailer Establishments in the City of Boston. Given the City of Boston's buffer zone requirements between Marijuana Establishments and the overall population density of the City, Debken anticipates a healthy business model, despite the number of operational Marijuana Establishments in the City of Boston.

### **Competitive Advantage**

Debken's competitive advantages over their competition include a dedicated group of sophisticated owners with the finances required to successfully operate a Marijuana Retailer Establishment in a major city.

### **Regulations**

Debken is a Massachusetts domestic for-profit corporation. Debken will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. Debken will apply for all state and local permits and approvals required to build out and operate the facility.

Debken will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

### **Products & Services**

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

1. Concentrates
2. Topical Salves
3. Creams and Lotions
4. Patches
5. Oral Mucosal and Sublingual Dissolving Tablets
6. Tinctures
7. Sprays
8. Inhalation Ready to Use CO2 Extracted Hash Oils
9. Pre-Dosed Oil Vaporizers
10. Ingestion Capsules
11. Infused Food and Beverages

### **Pricing Structure**

Debken's pricing structure will vary based on market conditions. Debken plans to provide products of superior quality and will price accordingly.

## **MARKETING & SALES**

### **Growth Strategy**

Debken's plan to grow the company includes:

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

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

### **Communication**

Debken will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the

warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

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

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

Debken will communicate with customers through:

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

Debken will provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

### **Sales**

Debken will sell its products and services by engaging customers with knowledgeable personnel. Debken will ensure that all marijuana products that are provided for sale to consumers are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.” Debken will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. In no instance will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

### **Logo**

Debken will develop a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

The logo will be discreet, unassuming, and will not use marijuana symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

#### **FINAL REMARKS**

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

Debken is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures and growth strategies. In doing so, Debken looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits that this market will yield.

## PLAN FOR OBTAINING LIABILITY INSURANCE

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

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

## PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

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

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

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

## QUALITY CONTROL AND TESTING

### Quality Control

Debken Corp. (“Debken”) will comply with the following sanitary requirements:

1. Any Debken agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Debken agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - a. Maintaining adequate personal cleanliness; and
  - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Debken’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Debken’s production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Debken’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Debken will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Debken’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Debken’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Debken’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Debken will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Debken acknowledges and understands that the Commission may require Debken to demonstrate the intended and actual use of any toxic items found on Debken’s premises;
11. Debken will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Debken’s needs;
12. Debken’s plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana

establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;

13. Debken will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Debken will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Debken will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

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

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

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

#### Testing

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

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

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

Debken's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. Debken acknowledges and understands that the Commission may require additional testing.

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

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

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

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the

Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

#### Quality Control Samples

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

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

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

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

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

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

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

## PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

### Overview

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

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

### Agent Personnel Records

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

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

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

### Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for Debken will undergo a detailed background investigation prior to being granted access to a Debken facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Debken pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Debken will consider:
  - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.

- b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
  - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Debken will:
  - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
  - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Debken will consider the following factors:
    - i. Time since the offense or incident;
    - ii. Age of the subject at the time of the offense or incident;
    - iii. Nature and specific circumstances of the offense or incident;
    - iv. Sentence imposed and length, if any, of incarceration, if criminal;
    - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
    - vi. Relationship of offense or incident to nature of work to be performed;
    - vii. Number of offenses or incidents;
    - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
    - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
    - x. Any other relevant information, including information submitted by the subject.
  - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.
- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.

- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Debken or the Commission.

#### Personnel Policies and Training

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

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

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

## RECORDKEEPING PROCEDURES

### General Overview

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

### Recordkeeping

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

- Corporate Records

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

- Insurance Coverage:
    - Directors & Officers Policy
    - Product Liability Policy
    - General Liability Policy
    - Umbrella Policy
    - Workers Compensation Policy
    - Employer Professional Liability Policy
  - Third-Party Laboratory Contracts
  - Commission Requirements:
    - Annual Agent Registration
    - Annual Marijuana Establishment Registration
  - Local Compliance:
    - Certificate of Occupancy
    - Special Permits
    - Variances
    - Site Plan Approvals
    - As-Built Drawings
  - Corporate Governance:
    - Annual Report
    - Secretary of Commonwealth Filings
- Business Records
- Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
- Assets and liabilities;
  - Monetary transactions;
  - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
  - Sales records including the quantity, form, and cost of marijuana products;

- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Debken.
- Personnel Records
  - At a minimum, Personnel Records will include:
    - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
    - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Debken and will include, at a minimum, the following:
      - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
      - Documentation of verification of references;
      - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
      - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
      - Documentation of periodic performance evaluations; and
      - A record of any disciplinary action taken.
      - Notice of completed responsible vendor and eight-hour related duty training.
    - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
    - Personnel policies and procedures; and
    - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
  - Debken will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
  - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
  - Debken will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Sales Records for Marijuana Retailer
  - Debken will maintain records that it has performed a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate the sales data and produce such records on request to the Commission.
- Incident Reporting Records

- Within ten (10) calendar days, Debken will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
- All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Debken for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Debken’s jurisdiction on request.
- Visitor Records
  - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor’s name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
  - When marijuana or marijuana products are disposed of, Debken will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Debken agents present during the disposal or other handling, with their signatures. Debken will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
  - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
  - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
  - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Debken is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
  - Debken will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
  - Records that any and all of Debken’s vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
  - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training

- Debken shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
  - In the event Debken closes, all records will be kept for at least two (2) years at Debken's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Debken will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

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

  - Security measures in compliance with 935 CMR 500.110;
  - Employee security policies, including personal safety and crime prevention techniques;
  - A description of Debken's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
  - Storage of marijuana in compliance with 935 CMR 500.105(11);
  - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
  - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
  - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
  - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
  - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
  - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
  - Alcohol, smoke, and drug-free workplace policies;
  - A plan describing how confidential information will be maintained;
  - Policy for the immediate dismissal of any dispensary agent who has:
    - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
    - Engaged in unsafe practices with regard to Debken operations, which will be reported to the Commission; or
    - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
  - A list of all board of directors, members, and executives of Debken, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Debken's website.

- Policies and procedures for the handling of cash on Debken premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
  - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
  - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
  - Debken shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

#### Record-Retention

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

## MAINTAINING OF FINANCIAL RECORDS

Debken Corp.'s ("Debken") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
  - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
    - Assets and liabilities;
    - Monetary transactions;
    - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    - Sales records including the quantity, form, and cost of marijuana products; and
    - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Debken.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
  - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
  - Prohibiting the use of software or other methods to manipulate or alter sales data;
  - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
    - If Debken determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
  - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
  - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales; and
  - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.
- Additional written business records will be kept, including, but not limited to, records of:
  - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);

- Fees paid under 935 CMR 500.005 or any other section of the Commission’s regulations; and
  - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission’s regulations.
- License Renewal Records
  - Debken shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city’s or town’s anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

## QUALIFICATIONS AND TRAINING

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

### Qualifications

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

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

### Training

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

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

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

### *Basic Core Curriculum*

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

- Marijuana's effect on the human body, including:
  - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
  - The amount of time to feel impairment;
  - Visible signs of impairment; and
  - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:

- How to check identification;
- Spotting and confiscating fraudulent identification;
- Common mistakes made in identification verification.
- Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Debken Agents which shall include:
  - Conduct of Debken Agents;
  - Permitting inspections by state and local licensing and enforcement authorities;
  - Local and state licensing and enforcement, including registration and license sanctions;
  - Incident and notification requirements;
  - Administrative, civil, and criminal liability;
  - Health and safety standards, including waste disposal;
  - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
  - Permitted hours of sale;
  - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
  - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

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

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

## ENERGY COMPLIANCE PLAN

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

### Potential Energy-Use Reduction Opportunities

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

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

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

### Renewable Energy Generation Opportunities

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

### Strategies to Reduce Electric Demand

Debken is considering the following strategies to reduce electric demand:

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

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

### Opportunities for Engagement with Energy Efficiency Programs

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

## DIVERSITY PLAN

### Statement of Purpose

Debken Corp. (“Debken”) will seek to create a thoughtful and forward-facing organization that attracts, implements, maintains, and leverages all that diversity in its staff can provide; and to specifically promote equity among minorities; women; veterans; people with disabilities; and people who identify as LGBTQ+.

### Goals

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

- Hiring such that Debken’s staff is comprised of at least the following:
  - a. 50% of all team members being women;
  - b. 10% of all team members being minorities;
  - c. 7% of all team members being veterans;
  - d. 12% of all team members being people with disabilities; and
  - e. 1% of all team members that identify as LGBTQ+
- Developing an Employee Training, Mentorship, and Promotion Program geared towards women, minorities, veterans, people with disabilities, and people who identify as LGBTQ+ whereby Debken will provide ongoing advancement training with management training occurring twice annually and with new skills development training occurring quarterly.

### Programs

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

- Debken will host or participate in job fairs for diverse participants to hire its initial employees. Debken will then host or participate in job fairs from time-to-time as its hiring needs require (but not less than annually). Additionally, Debken will post its hiring opportunities with non-profit, neighborhood, and community organizations, and other appropriate social equity outlets in an effort to reach and promote equity among minorities; women; veterans; people with disabilities; and people who identify as LGBTQ+.
- Debken’s Employee Training, Mentorship, and Promotion Program will help (1) advance employee growth by providing on-the-job next-level training targeted on helping employees gain the new skillsets needed to advance to new roles that provide greater responsibilities; (2) provide mentor matches with other employees and management to support employee efforts and advancement; and (3) generate ongoing feedback from our diverse workforce to constantly measure the effectiveness of Debken’s efforts. Advancement training will be ongoing. New skills development training will be formal quarterly training. Management trainee program training will be twice yearly with ongoing mentorship during the year for management trainees. Interested, qualified employees will submit a letter of interest to the Diverse Workforce Hire Committee. The Diverse Workforce Hire Committee will then identify any qualified mentees before conducting a blind selection process.

### Measurements

The Diverse Workforce Hire Committee will administer the Plan and will be responsible for developing measurable outcomes to ensure Debken continues to meet its commitments. Such measurable outcomes, in accordance with Debken's goals and programs described above, include:

- Completing an employee demographic survey to ensure that Debken's hiring goals are being met;
- Documenting all job fairs hosted or participated in, including any advertisements, posts, or recordkeeping concerning participants;
- Implementing recordkeeping for the Employee Training, Mentorship, and Promotion Program, including documenting participants, training materials, and relevant logs for advancement training, new skills development, and management training.

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

### Acknowledgements

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