



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC283278  
Original Issued Date: 04/22/2022  
Issued Date: 04/22/2022  
Expiration Date: 04/22/2023

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: EC Developments

Phone Number: 412-651-1178  
Email Address: Emily@CannaBusinessServices.com

Business Address 1: 1385 Bernardston Road  
Business City: Greenfield Business State: MA Business Zip Code: 01301  
Mailing Address 1: 1385 Classic Court  
Mailing City: Mount Pleasant Mailing State: SC Mailing Zip Code: 29466

### 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: 91 Percentage Of Control: 100  
Role: Other (specify) Other Role: Managing Partner

First Name: Emily	Last Name: Seelman	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: 9	Percentage Of Control:
Role: Other (specify)	Other Role: Silent Partner
First Name: Cory	Last Name: Waggoner Suffix:
Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

No records found

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

##### Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Cory	Owner Last Name: Waggoner	Owner Suffix:	
Entity Legal Name: Higher Yields Consulting		Entity DBA:	
Entity Description: Provides cannabis business consulting to clients across the country			
Entity Phone: 844-449-4353	Entity Email: Info@Higheryieldsconsulting.com	Entity Website: www.HigherYieldsConsulting.com	
Entity Address 1: 2590 Walnut St Suite #25		Entity Address 2:	
Entity City: Denver	Entity State: CO	Entity Zip Code: 80205	Entity Country: USA
Entity Mailing Address 1: 2590 Walnut St Suite #25		Entity Mailing Address 2:	
Entity Mailing City: Denver	Entity Mailing State: CO	Entity Mailing Zip Code: 80205	Entity Mailing Country: USA

##### Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Emily	Owner Last Name: Seelman	Owner Suffix:	
Entity Legal Name: Tetra Growth Systems		Entity DBA: Canna Business Services	
Entity Description: Consulting company providing support to clients seeking to engage in their state's cannabis market.			
Entity Phone: 888-453-0555	Entity Email: info@CannaBusinessServices.com	Entity Website: www.CannaBusinessServices.com	
Entity Address 1: 260 Old Lebanon Church Road		Entity Address 2:	
Entity City: Pittsburgh	Entity State: PA	Entity Zip Code: 15236	Entity Country: USA

Entity Mailing Address 1: 260 Old Lebanon Church Road		Entity Mailing Address 2:	
Entity Mailing City: Pittsburgh	Entity Mailing State: PA	Entity Mailing Zip Code: 15236	Entity Mailing Country: USA

#### DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1385 Bernardston Road	
Establishment Address 2:	
Establishment City: Greenfield	Establishment Zip Code: 01301
Approximate square footage of the Establishment: 40000	How many abutters does this property have?: 2
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	
Cultivation Tier:	Cultivation Environment:

#### FEE QUESTIONS

Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft    Cultivation Environment: Indoor

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HOST COMMUNITY AGREEMENT CERTIFICATION FORM.pdf	pdf	60d89e8384f3fe0296c3e719	06/27/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT I.pdf	pdf	60d89f3f2ea73e03647685ce	06/27/2021
Plan to Remain Compliant with Local Zoning	PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING.pdf	pdf	60d8a114629ad9037af1c7b7	06/27/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT II.pdf	pdf	612cf28fac54100740712918	08/30/2021
Community Outreach Meeting Documentation	COMMUNITY OUTREACH MEETING DOCUMENTS PT III.pdf	pdf	612cf297e014b807395c3f77	08/30/2021

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact.pdf	pdf	6172c75ee3155f31cafc7f27	10/22/2021

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other (specify) Other Role: CEO

First Name: Emily Last Name: Seelman Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### Individual Background Information 2

Role: Manager Other Role:

First Name: Cory Last Name: Waggoner Suffix:

RMD Association: Not associated with an RMD

Background Question: yes

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	EC DEVELOPMENTS CERTIFICATE OF ORGANIZATION.pdf	pdf	60d8e25523f3f9033f372b61	06/27/2021
Department of Revenue - Certificate of Good standing	Certificate of Good Standing -Dept of Revenue.pdf	pdf	60d9c0a174b6080359f6d530	06/28/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing Pt1- Secretary.pdf	pdf	60e5bec504b25036f755abe	07/07/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing Pt2- Secretary.pdf	pdf	60e5bed423f3f9033f3750b8	07/07/2021
Bylaws	Ec Developments Operating Agreement .pdf	pdf	612d71bcb9f60d076b8d37b5	08/30/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Compliance 22203742.pdf	pdf	61390980ab6739076439f482	09/08/2021

No documents uploaded

Massachusetts Business Identification Number: 001455824

Doing-Business-As Name:

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	60e60d991159b60338d4d57c	07/07/2021
Proposed Timeline	Proposed Timeline.pdf	pdf	60e60ed67a4b3b034a67fe42	07/07/2021
Business Plan	Business Plan.pdf	pdf	612cf8bbd905310789ae0c2b	08/30/2021

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:



Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	Policies and Procedures for Cultivating.pdf	pdf	60ec61d223f3f9033f3764ba	07/12/2021
Prevention of diversion	Prevention of diversion.pdf	pdf	60ed8f7c2ea73e036476c47d	07/13/2021
Storage of marijuana	Storage of Marijuana.pdf	pdf	60ed90ce308c7a02a1fff68d	07/13/2021
Quality control and testing	Quality Control and Testing.pdf	pdf	60eda15fda52e3026d4626b2	07/13/2021
Record Keeping procedures	Recordkeeping Procedures.pdf	pdf	60eda8f58d6c3f02b7d1c44f	07/13/2021
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	60edaa180bb484027d8beebc	07/13/2021
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	60edd0b884f3fe0296c428bf	07/13/2021
Inventory procedures	Inventory Procedures.pdf	pdf	60f5d5e723f3f9033f3785b0	07/19/2021
Security plan	Security Plan.pdf	pdf	612d095bac54100740712a93	08/30/2021
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	612d097ca82c5807742a5e3e	08/30/2021
Personnel policies including background checks	Personnel Policies Including Background Checks.pdf	pdf	612d0a9d0b068e0732629999	08/30/2021
Restricting Access to age 21 and older	Restricting Access to age 21 and older.pdf	pdf	612d0ab4e014b807395c4120	08/30/2021
Policies and Procedures for cultivating.	Policies and Procedures for Cultivating.pdf	pdf	612d0aceb9f60d076b8d32f5	08/30/2021
Qualifications and training	CULTIVATION-Qualifications and Training.pdf	pdf	612d0c9b25900e079f2b325b	08/30/2021
Diversity plan	Diversity plan.pdf	pdf	6130c96de014b807395c574e	09/02/2021

#### ATTESTATIONS

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

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

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

Notification:

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 8:00 PM

# Host Community Agreement Certification Form

## Instructions

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

## Certification

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

1. Name of applicant:

EC Developments

2. Name of applicant's authorized representative:

Emily Seelman

3. Signature of applicant's authorized representative:

*Emily Seelman*

4. Name of municipality:

City of Greenfield

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

*Eric Twarog, Director of the Dept. of Planning & Development*



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

*Eric Trump*

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

*eric.trump@greenfield-ma.gov*

8. Host community agreement execution date:

5/19/2021



# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

1. The Community Outreach Meeting was held on the following date(s):
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:
- The type(s) of ME or MTC to be located at the proposed address;
  - Information adequate to demonstrate that the location will be maintained securely;
  - Steps to be taken by the ME or MTC to prevent diversion to minors;
  - A plan by the ME or MTC to positively impact the community; and
  - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:

*[Handwritten Signature]*



# Greenfield Recorder (newspaper) notice

## ATTACHMENT A

S

**From:** shunter@recorder.com  
**Subject:** Receipt  
**Date:** June 11, 2021 at 8:39 AM  
**To:** seelmanee1@gmail.com

Hi Emily here is your receipt. Suzanne

## Greenfield Recorder

14 Hope Street, Greenfield, MA

413-772-0261 | Fax: 413-774-5511 | Customer Service: 413-772-0148

## Advertising Receipt

LEGALS CASH ACCOUNT  
14 HOPE ST  
GREENFIELD, MA 01301

Cust#:15585  
Ad#:135067  
Phone#:4137720261228  
Date:06/11/2021

Salesperson: SUZANNE HUNTER Classification: Legals Ad Size: 1.0 x 3.40

### Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
The Recorder	06/14/2021	06/14/2021	1	106.62	106.62

### Payment Information:

Date: 06/10/2021 Order# 135067 Type CreditCard

Total Amount: 106.62

Tax: 0.00

Total Payments: 106.62

Amount Due: 0.00

COMMUNITY OUTREACH MEETING JUNE 28 - Thank you for your business!

### Ad Copy

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

June 14

135067

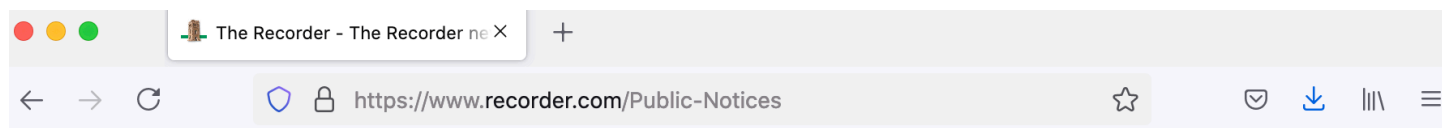


**Notice is hereby given** that a **Community Outreach Meeting for a proposed Marijuana Establishment** is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

June 14

135067

## Greenfield Recorder (newspaper) notice (14 days prior to Community Outreach Meeting)



### GREENFIELD RECORDER

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E-Edition

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Mobile Deposit is app to make banking easier!

**Greenfield Savings Bank**  
Member FDIC/Member DIF

## Public Notices

PUBLIC NOTICE SEARCH

[Back to Results](#)

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions. June 14 135067

Massachusetts Public Notices.org Notice published June 14, 2021  
(14 days prior to Community Outreach Meeting)

The screenshot shows a web browser window with the URL <https://www.masspublicnotices.org/Search.aspx#content-sub>. The page header includes the logo "mnp|a" and navigation links: "About Public Notices | Help", "Smart Search", and "Sign-in".

**SEARCH PUBLIC NOTICES:**

POPULAR SEARCHES

SEARCH:

EXCLUDE:

FILTERED BY:

COUNTY	Any	<input data-bbox="506 1171 539 1213" type="button" value="+"/>
CITY	Any	<input data-bbox="506 1245 539 1287" type="button" value="+"/>
PUBLICATION	Any	<input data-bbox="506 1318 539 1360" type="button" value="+"/>
DATE RANGE	4/27/2021 6/27/2021	<input data-bbox="506 1392 539 1434" type="button" value="+"/>

Home > Search Results > Public Notice Detail

Publication: **Recorder, The**

<input type="button" value="VIEW"/>	<b>Recorder, The</b> Monday, June 14, 2021
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Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pm EST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipate ... **click 'view' to open the full text.**



Geneva Bickford <geneva.bickford@greenfield-ma.gov>

## Notice for Community Outreach Meeting

1 message

Emily Seelman <Emily@higheryieldsconsulting.com>

Tue, Jun 8, 2021 at 5:22 PM

To: "townclerk@greenfield-ma.gov" <townclerk@greenfield-ma.gov>

Clerk Kathryn,

Good afternoon!

My name is Emily Seelman, co-founder of EC Developments, LLC. We are applying for cannabis establishments in Greenfield. The Massachusetts Cannabis Control Commission ("Commission") requires applicants to notify the host municipality of its planned Community Outreach Meeting under 935 CMR 500.000 which establishes the regulatory requirements for adult use marijuana in the Commonwealth. Below please find EC Development's notice of the Community Outreach Meeting that will also run in the Recorder.

The Commission has requested that applicants submit their application with the Clerk's "date/time stamped" notice posted in town hall. If possible, can you provide me with an email attaching a scanned copy of a time stamped notice of the Community Outreach Meeting as follows?

**Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 25, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.**

EC Developments, LLC

June 8, 2021

Thank you so much!

GREENFIELD, MASS  
2021 JUN -9 AM 8:17  
CITY CLERK



**HIGHERYIELDS**  
CANNABIS BUSINESS CONSULTANTS



### EMILY SEELMAN

Senior Technical Writer

844-HI-YIELD

info@higheryieldsconsulting.com

higheryieldsconsulting.com

## PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

EC Developments, LLC will remain compliant at all times with the local zoning requirements set forth in the City of Greenfield's Zoning Ordinance.

EC Developments property is in compliance with Zoning Ordinance, Chapter 200, Article VII, s. 200-7.17 and complies with the City of Greenfield Table of Uses based on location.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

As required by the City of Greenfield's Zoning Ordinance, EC Developments will apply for a Special Use Permit and/or Site Plan Approval, as applicable, upon acquisition of a license by the State of Massachusetts. EC Developments will also apply for any other local permits required to operate at the proposed location.

EC Developments will comply with all requirements set forth in any local permit required to operate at the proposed location. The leadership team at EC Developments has already attended several meetings with various municipal officials and boards to discuss its plans to operate and has executed a Host Community Agreement with the City of Greenfield. EC Developments will continue to work cooperatively with various municipal departments, boards, and officials to ensure that it remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

**From:** Emily Seelman [Emily@higheryieldsconsulting.com](mailto:Emily@higheryieldsconsulting.com)  
**Subject:** Re: Notice for Community Outreach Meeting  
**Date:** June 10, 2021 at 4:01 PM  
**To:** Geneva Bickford [geneva.bickford@greenfield-ma.gov](mailto:geneva.bickford@greenfield-ma.gov)  
**Cc:** [townclerk@greenfield-ma.gov](mailto:townclerk@greenfield-ma.gov)



Good afternoon!

We had a slight hiccup with the publication timeline. So we will now be updating the meeting to June 28th rather than June 25th. This will allow for a full 14 days of publication by the local newspaper to serve as sufficient notice to community members.

Thus, the new notice we will require to be date and time stamped reads as follows:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

Thank you so much for your help!



**EMILY SEELMAN**

Senior Technical Writer

844-HI-YIELD

[info@higheryieldsconsulting.com](mailto:info@higheryieldsconsulting.com)

[higheryieldsconsulting.com](http://higheryieldsconsulting.com)

On Jun 9, 2021, at 8:42 AM, Geneva Bickford <[geneva.bickford@greenfield-ma.gov](mailto:geneva.bickford@greenfield-ma.gov)> wrote:

Good Morning Emily,

Please see the attached.

Thanks,

Geneva

**Geneva Bickford**  
**Assistant City Clerk**  
**14 Court Square**  
**Greenfield, MA 01301**  
**Email: [geneva.bickford@greenfield-ma.gov](mailto:geneva.bickford@greenfield-ma.gov)**  
**Phone: 413-772-1555**  
**Fax: 413-772-1542**

#### IMPORTANT UPCOMING DATES:

**4/26/2021 Nomination papers will be available in the City Clerk's Office**

**\*\*Tuesday, September 14, 2021: Local Preliminary Election**

**Tuesday, November 2, 2021: Local Election**

**\*\*A PRELIMINARY ELECTION MAY NOT BE NECESSARY**

**As of Monday, March 15, 2021 Greenfield City Clerk's Office will be open from 10 a.m. to 1 p.m., Monday - Friday. All VITAL RECORDS REQUESTS REQUIRE 24 HOURS NOTICE BEFORE PICKUP.**

As always you may order vital records and dog licenses online by using the following link:

<https://unipaygold.unibank.com/customerinfo.aspx> or you may send a request in writing to the City Clerk's Office, 14 Court Sq., Greenfield, MA 01301, your request must include payment along with a self addressed stamped envelope, if you are ordering a dog license you MUST provide a copy of your most recent rabies paperwork which will be returned to you.

For Marriage Intentions you must call (413-772-1555 xtn. 6162) to schedule an appointment.

For further information please visit the City Clerk's website: <https://greenfield-ma.gov/p/16/City-Clerks-Office>. You may also contact us by telephone (413-772-1555 xtn. 6162) or email ([cityclerk@greenfield-ma.gov](mailto:cityclerk@greenfield-ma.gov)).

On Tue, Jun 8, 2021 at 5:22 PM Emily Seelman <[Emily@higheryieldsconsulting.com](mailto:Emily@higheryieldsconsulting.com)> wrote:  
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My name is Emily Seelman, co-founder of EC Developments, LLC. We are applying for cannabis establishments in Greenfield. The Massachusetts Cannabis Control Commission ("Commission") requires applicants to notify the host municipality of its planned Community Outreach Meeting under 935 CMR 500.000 which establishes the regulatory requirements for adult use marijuana in the Commonwealth. Below please find EC Development's notice of the Community Outreach Meeting that will also run in the Recorder.

The Commission has requested that applicants submit their application with the Clerk's "date/time stamped" notice posted in town hall. If possible, can you provide me with an email attaching a scanned copy of a time stamped notice of the Community Outreach Meeting as follows?

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 25, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

EC Developments, LLC

June 8, 2021

Thank you so much!



**EMILY SEELMAN**

Senior Technical Writer

☎ 844-HI-YIELD

✉ [info@higheryieldsconsulting.com](mailto:info@higheryieldsconsulting.com)

🌐 [higheryieldsconsulting.com](http://higheryieldsconsulting.com)

<community outreach meeting timestamp.pdf>





**Re: Notice for Community Outreach Meeting**

1 message

**Emily Seelman** <Emily@higheryieldsconsulting.com>

Thu, Jun 10, 2021 at 4:01 PM

To: Geneva Bickford <geneva.bickford@greenfield-ma.gov>

Cc: "townclerk@greenfield-ma.gov" <townclerk@greenfield-ma.gov>

Good afternoon!

We had a slight hiccup with the publication timeline. So we will now be updating the meeting to June 28th rather than June 25th. This will allow for a full 14 days of publication by the local newspaper to serve as sufficient notice to community members.

Thus, the new notice we will require to be date and time stamped reads as follows:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will be also an opportunity for the public to ask questions.

Thank you so much for your help!



**EMILY SEELMAN**

Senior Technical Writer

☎ 844-HI-YIELD

✉ info@higheryieldsconsulting.com

🌐 higheryieldsconsulting.com

GREENFIELD, MASS  
2021 JUN 11 AM 3:17  
CITY CLERK

On Jun 9, 2021, at 8:42 AM, Geneva Bickford <geneva.bickford@greenfield-ma.gov> wrote:

Good Morning Emily,

Please see the attached.

Thanks,

Geneva

**Geneva Bickford**

**Assistant City Clerk**

**14 Court Square**

**Greenfield, MA 01301**

**Email: geneva.bickford@greenfield-ma.gov**

**Phone: 413-772-1555**

**Fax: 413-772-1542**

**IMPORTANT UPCOMING DATES:**

**4/26/2021 Nomination papers will be available in the City Clerk's Office**

**\*\*Tuesday, September 14, 2021: Local Preliminary Election**

**Tuesday, November 2, 2021: Local Election**



## Letters sent to abutters and neighboring property owners

Dear property owner,

My name is Emily Seelman, co-owner of EC Developments, an adult-use cannabis retailer, manufacturing, and cultivation operation, taking place in Greenfield, Massachusetts. As a potential abutter of the property, I wanted to provide you with the following notice:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, June 28, 2021 at 6:00pmEST at 1385 Bernardston Road, Greenfield, MA 01301. The proposed marijuana retailer, manufacturing, and cultivation facility establishments are anticipated to be located at 1385 Bernardston Road, Greenfield, MA 01301. We will disclose the types of facilities to be located at the proposed address, our security plan, diversion prevention, plan to positively impact the community, demonstration that our location will not constitute a nuisance as defined by law, and all other topics as required by the Massachusetts Cannabis Control Commission and requested by community members. There will also be an opportunity for the public to ask questions.

Thank you,

Emily Seelman  
Co-Owner, EC Developments  
[Emily@HigherYieldsConsulting.com](mailto:Emily@HigherYieldsConsulting.com)

LIST OF ABUTTERS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Receipt showing addresses of abutters and neighboring properties



Address: 3330 S 700 E  
SALT LAKE CITY  
UT 84106  
Location: NPHKC  
Device ID: -BTC01  
Transaction: 940303655357

---

FedEx Express Saver  
280317918183 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021  
Pricing option:  
ONE RATE  
Package Information:  
FedEx Envelope

---

FedEx Express Saver  
280317931798 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021  
Pricing option:  
ONE RATE  
Package Information:  
FedEx Envelope

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FedEx Express Saver  
280317947764 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021  
Pricing option:

Receipt showing addresses of abutters and neighboring properties

[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317947764 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317959069 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317974312 0.10 lb (S) 11.55  
Declared Value 0  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317998456 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

## Receipt showing addresses of abutters and neighboring properties

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317974312 0.10 lb (S) 11.55  
Declared Value 0  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

FedEx Express Saver  
280317998456 0.10 lb (S) 11.55  
Declared Value 100  
Recipient Address:  
[REDACTED]

Scheduled Delivery Date 6/16/2021

Pricing option:  
ONE RATE

Package Information:  
FedEx Envelope

Shipment subtotal: \$69.30

Total Due: \$69.30

(S) CreditCard: \$69.30  
\*\*\*\*\*6575

M = Weight entered manually  
S = Weight read from scale  
Taxable item

Terms and Conditions apply. See  
[fedex.com/us/service-guide](https://fedex.com/us/service-guide) for details.

## PLANS FOR POSITIVE IMPACT

### 1. Employment of Minorities, Females, Veterans, and Individuals Disproportionately Impacted by Prior Cannabis Laws

#### (a) Hiring and Staffing Goals

EC Developments would like to continue to support the citizens of Massachusetts by prioritizing employment of individuals who have been disproportionately impacted by prior cannabis laws<sup>1</sup>. EC Developments shall hire 10% of its staff that are Massachusetts residents who have past cannabis convictions.

#### (b) Programs Designed to Support EC Development's

In order to support EC Developments' efforts to meet the above mentioned goals, EC Developments will promote the opening of positions through local job fairs and job boards. EC Developments will post on job boards such as Intercept 4: ReEntry --whose focus is to list company employment openings for individuals with prior minor cannabis possession. EC Developments will participate in, at minimum, one local job fair per year and will post hiring needs in local job boards and newspapers (such as the Greenfield Reporter), at minimum, two times per year.

#### (c) Milestones and Measurements

EC Development's CEO, COO, and Management will work together to ensure the ongoing success of its Plan for Positive Impact, including success rate of hitting each milestone and goal/objective. Together, these individuals will comprise the company's Community Impact Advisory Team (CIA Team). The CIA Team will document the number and placement of job opportunities posted through the OSD, job boards, newspapers, and all other media and publications. The CIA Team will track the quantity and demographics of individuals who respond to the employment advertisement, submit resumes, interview, participate in follow up interviews, undergo background checks, and are hired. The CIA Team will work with local job fair organizations to ensure yearly participation in these fairs. The CIA Team will document the number of job fairs in which the company has participated, the targeted demographics who have engaged with the company at the fair, resumes received, resulting interviews, and hiring.

These numbers will be monitored on a monthly basis to ensure that the company is successfully working towards its minimum goal of 10% staff composed of those with prior minor cannabis possession charges. Each quarter, these numbers will be reviewed by the CIA Team and analyzed for areas for improvement. These quarterly reviews will allow the CIA Team to determine if its goals and processes to reach these goals are successful or require more improvement. By

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<sup>1</sup> Individuals disproportionately impacted by prior cannabis laws, includes those with small possession charges, but will otherwise pass background checks to ensure the safety and security of EC Developments' establishment.

example, the CIA Team will count the number of individuals hired who have past minor cannabis possession convictions. This number will be assessed from the total number of individuals hired to ensure that its minimum percentages (or greater) are met. The Progress and success of this plan will be thoroughly documented, evaluated, and reviewed annually from provisional licensure, upon license renewal and each year thereafter. The Plan will account for demonstration of proof of progress and success upon its yearly license renewal.

EC Developments will not advertise through the marketing of free promotional items, gifts, giveaways, discounts, points-based reward systems, customer loyalty programs, coupons, and “free” or “donated” cannabis, except as otherwise permitted by 935 500.105(4)(a)(9) and except for the provision of brand name take-away bags for the benefit of customers. EC Developments will adhere to the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. Any actions taken, or programs instituted, by EC Developments will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.



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

Minimum Fee: \$500.00

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

**Certificate of Organization**

(General Laws, Chapter )

Identification Number: 001455824

1. The exact name of the limited liability company is: EC DEVELOPMENTS LLC

**2a. Location of its principal office:**

No. and Street: 1385 BERNARDSTON ROAD  
 City or Town: GREENFIELD State: MA Zip: 01301 Country: USA

**2b. Street address of the office in the Commonwealth at which the records will be maintained:**

No. and Street: 1385 BERNARDSTON ROAD  
 City or Town: GREENFIELD State: MA Zip: 01301 Country: USA

**3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:**

REAL ESTATE INVESTING, AND ANY LAWFUL BUSINESS FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS."

**4. The latest date of dissolution, if specified:**

**5. Name and address of the Resident Agent:**

Name: REGISTERED AGENTS INC.  
 No. and Street: 82 WENDELL AVE.  
STE 100  
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

I, REGISTERED AGENTS INC. resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

**6. The name and business address of each manager, if any:**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

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

Title	Individual Name	Address (no PO Box)



	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
SOC SIGNATORY	CORY WAGGONER	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA
SOC SIGNATORY	EMILY SEELMAN	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	CORY WAGGONER	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA
REAL PROPERTY	EMILY SEELMAN	1385 BERNARDSTON ROAD GREENFIELD, MA 01301 USA

**9. Additional matters:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 26 Day of August, 2020,**  
EMILY E. SEELMAN

*(The certificate must be signed by the person forming the LLC.)*

THE COMMONWEALTH OF MASSACHUSETTS

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

August 26, 2020 12:13 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

mass.gov/dor

Letter ID: L0678146240  
Notice Date: June 28, 2021  
Case ID: 0-001-211-541



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EC DEVELOPMENTS LLC  
1385 CLASSIC CT APT 330  
MOUNT PLEASANT SC 29466-7248

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

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

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

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

### ***What if I have questions?***

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

### ***Visit us online!***

Visit [mass.gov/dor](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



William Francis Galvin  
Secretary of the  
Commonwealth

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

June 23, 2021

TO WHOM IT MAY CONCERN:

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

**EC DEVELOPMENTS LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 26, 2020.**

I further certify that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that, so far as appears of record, said Limited Liability Company has legal existence.



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

Processed By:sam





William Francis Galvin  
Secretary of the  
Commonwealth

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

June 23, 2021

TO WHOM IT MAY CONCERN:

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

**EC DEVELOPMENTS LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 26, 2020.**

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

I also certify that the names of all managers listed in the most recent filing are: **NONE**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **CORY WAGGONER, EMILY SEELMAN**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **CORY WAGGONER, EMILY SEELMAN**



Processed By:sam

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

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT  
FOR**

**EC DEVELOPMENTS**

**A Limited Liability Company**

THIS LIMITED LIABILITY COMPANY AGREEMENT (the Agreement) is made and entered into this 26th day of August, 2020 by the Managers listed below:

<b>Owner 1</b> Emily Seelman 1385 Classic Court, Unit 330, Mount Pleasant, SC 29466	<b>Owner 2</b> Cory Waggoner 3201 Brighton Blvd, Unit 387, Denver, CO 80216
<b>Percentage Ownership</b> 91%	<b>Percentage Ownership</b> 9%
<b>Role</b> CEO	<b>Role</b> Silent partner

As of this date the Managers have formed EC Developments ("Company") named above under the laws of the State of Massachusetts on August 26, 2020. Accordingly, in consideration of the conditions contained herein, they agree as follows:

**ARTICLE I**  
**Company Formation and Registered Agent**

1.1 **FORMATION.** The Members hereby form a Limited Liability Company subject to the provisions of the Massachusetts Uniform Limited Liability Company Act as may be amended from time to time. Articles of Organization were filed with the Secretary of State on August 26, 2020.



1.2 NAME. The name of the Company shall be: EC Developments, LLC

1.3 REGISTERED OFFICE AND AGENT. The location of the registered office of the Company shall be:

REGISTERED AGENTS INC.  
82 WENDELL AVE  
STE 100  
PITTSFIELD, MA 01201

1.4 TERM. The Company shall continue in perpetuity, except for the dissolution as permitted by 1.4(a)-(d) listed herein.

(a) Managers whose capital interest as defined in Article 2.2 exceeds 50 percent vote for dissolution; or (b) Any event which makes it unlawful for the business of the Company to be carried on by the Managers; or

(b) The majority vote of the original managing members as listed above.

(c) Any other event causing a dissolution of a Limited Liability Company under the laws of the State of Massachusetts.

1.5 CONTINUANCE OF COMPANY. Notwithstanding the provisions of ARTICLE 1.4, in the event of an occurrence described in ARTICLE 1.4(c), if there are at least two remaining Managers, said remaining Managers shall have the right to continue the business of the Company. Such right can be exercised only by the majority vote of the remaining Managers within ninety (90) days after the occurrence of an event described in ARTICLE 1.4(c). If not so exercised, the right of the Managers to continue the business of the Company shall expire.

1.6 BUSINESS PURPOSE. The purpose of the Company is to engage in any lawful act or activity for which a Limited Liability Company may be formed under the Limited Liability statutes of the State of Massachusetts.

1.7 PRINCIPAL PLACE OF BUSINESS. The location of the principal place of business of the Company shall be:

1385 Bernardston Road, Greenfield, MA 01301

1.8 THE MANAGERS. The name and place of residence of each member are contained in Exhibit 2 attached to this Agreement.

1.9 ADMISSION OF ADDITIONAL MANAGERS. Except as otherwise expressly provided in the Agreement, no additional Managers may be admitted to the Company through issuance by the company of a new interest in the Company without the prior majority vote of the Managers.

## **ARTICLE 2**

### **Capital Contributions**

2.1 INITIAL CONTRIBUTIONS. The Managers initially shall contribute to the Company capital as described in Exhibit 3 attached to this Agreement. The agreed value of such property and cash is \$200,000.

2.2 ADDITIONAL CONTRIBUTIONS. Except as provided in ARTICLE 6.2, the Managers shall equally split the cost of additional contribution to the Company's capital.

## **ARTICLE 3**

### **Profits, Losses and Distributions**

3.1 PROFITS/LOSSES. For financial accounting and tax purposes the Company's net profits or net losses shall be determined on an annual basis and shall be allocated to the Managers in proportion to each Manager's relative capital interest in the Company as set forth in Exhibit 2 as amended from time to time in accordance with Treasury Regulation 1.704-1.

3.2 DISTRIBUTIONS. The Managers shall review, determine, and distribute available free cash flow quarterly. Free cash flow as referred to herein, shall mean the net cash of the Company available after appropriate provision for expenses and liabilities, as determined by the Managers.

## **ARTICLE 4**

### **Management**

4.1 MANAGEMENT OF THE BUSINESS. The name and place of residence of each Manager is attached as Exhibit 1 of this Agreement. By a vote of the Managers holding a majority of the capital interests in the Company, as set forth in Exhibit 2 as amended from time to time, shall elect so many Managers as the Members determine, but no fewer than one.



4.2 MEMBERS. The liability of the Members shall be limited as provided under the laws of the Massachusetts Limited Liability statutes. Members that are not Managers shall take no part whatever in the control, management, direction, or operation of the Company's affairs and shall have no power to bind the Company. The Managers may from time to time seek advice from the Members, but they need not accept such advice, and at all times the Managers shall have the exclusive right to control and manage the Company. No Member shall be an agent of any other Member of the Company solely by reason of being a Member.

4.3 POWERS OF MANAGERS. The Managers are authorized on the Company's behalf to make the following decisions only upon majority vote in agreement by the Managing Members, including: (a) the sale, development lease or other disposition of the Company's assets; (b) the purchase or other acquisition of other assets of all kinds; (c) the management of all or any part of the Company's assets; (d) the borrowing of money and the granting of security interests in the Company's assets; (e) the pre-payment, refinancing or extension of any loan affecting the Company's assets; (f ) the compromise or release of any of the Company's claims or debts; and, (g) the employment of persons, firms or corporations for the operation and management of the company's business. In the exercise of their management powers, the Managers are authorized to execute and deliver the following, only upon majority vote in agreement by the Managing Members: (a) all contracts, conveyances, assignments leases, sub-leases, franchise agreements, licensing agreements, management contracts and maintenance contracts covering or affecting the Company's assets; (b) all checks, drafts and other orders for the payment of the Company's funds; (c) all promissory notes, loans, security agreements and other similar documents; and, (d) all other instruments of any other kind relating to the Company's affairs, whether like or unlike the foregoing.

The voting power of the Managing Members are outlined a follows:

SHAREHOLDER NAME	POSITION	VOTE
Emily Seelman	CEO	91
Cory Waggoner	General Manager	9

4.4 COMPANY POSITIONS. Managers shall have the responsibility for managing the operations of the Company and for effectuating decisions on behalf of the Company.

4.5 NOMINEE. Title to the Company's assets shall be held in the Company's name or in the name of any nominee that the Managers may designate. The Managers shall have power to enter into a nominee agreement with any such person, and such agreement may contain provisions indemnifying the nominee, except for his willful misconduct.

4.6 COMPANY INFORMATION. Upon request, the Managers shall supply to any member information regarding the Company or its activities. Each Member or his

authorized representative shall have access to and may inspect and copy all books, records and materials in the Manager's possession regarding the Company or its activities. The exercise of the rights contained in this ARTICLE 4.6 shall be at the requesting Member's expense.

4.7 EXCULPATION. Any act or omission of the Managers, the effect of which may cause or result in loss or damage to the Company or the Members if done in good faith to promote the best interests of the Company, shall not subject the Managers to any liability to the Members.

4.8 INDEMNIFICATION. The Company shall indemnify any person who was or is a party defendant or is threatened to be made a party defendant, pending or completed action, suit or proceeding, whether civil, criminal, administrative, or investigative (other than an action by or in the right of the Company) by reason of the fact that he is or was a Member of the Company, Manager, employee or agent of the Company, or is or was serving at the request of the Company, for instant expenses (including attorney's fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred in connection with such action, suit or proceeding if the Members determine that he acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interest of the Company, and with respect to any criminal action proceeding, has no reasonable cause to believe his/her conduct was unlawful. The termination of any action, suit, or proceeding by judgment, order, settlement, conviction, or upon a plea of "no lo Contendere" or its equivalent, shall not in itself create a presumption that the person did or did not act in good faith and in a manner which he reasonably believed to be in the best interest of the Company, and, with respect to any criminal action or proceeding, had reasonable cause to believe that his/her conduct was lawful.

4.9 RECORDS. The Managers shall cause the Company to keep at its principal place of business the following:

- (a) a current list in alphabetical order of the full name and the last known street address of each Member;
- (b) a copy of the Articles of Organization, EIN, and the Company Operating Agreement and all amendments;
- (c) copies of the Company's federal, state and local income tax returns and reports, if any, for the three most recent years;
- (d) copies of any financial statements of the limited liability company for the three most recent years.

## **ARTICLE 5**

### **Compensation**



5.1 MANAGEMENT FEE. Any Manager or Member rendering services to the Company shall be entitled to compensation commensurate with the value of such services.

5.2 REIMBURSEMENT. The Company shall reimburse the Managers or Members for all direct out-of-pocket expenses incurred by them in managing the Company.

## **ARTICLE 6**

### **Bookkeeping**

6.1 BOOKS. The Managers shall maintain complete and accurate books of account of the Company's affairs at the Company's principal place of business. Such books shall be kept on such method of accounting as the Managers shall select. The company's accounting period shall be the calendar year.

6.2 MEMBER'S ACCOUNTS. The Managers shall maintain separate capital and distribution accounts for each member. Each member's capital account shall be determined and maintained by the Company and shall consist of his initial capital contribution increased by:

- (a) any additional capital contribution made by him/her; and/or
- (b) credit balances transferred from his/her distribution account to his/her capital account.

6.3 REPORTS. The Managers shall close the books of account after the close of each calendar year, and shall prepare and send to each member a statement of such Member's distributive share of income and expense for income tax reporting purposes.

## **ARTICLE 7**

### **Transfers**

7.1 ASSIGNMENT. If at any time a Member proposes to sell, assign or otherwise dispose of all or any part of his interest in the Company, such Member shall first make a written offer to sell such interest to the other Members at a price determined by mutual agreement. If such other Members decline or fail to elect such interest within forty-five (45) days, and if the sale or assignment is made and the Members fail to approve this sale or assignment by majority vote then, pursuant to the Massachusetts Uniform Limited Liability statutes, the purchaser or assignee shall have no right to participate in the management of the business and affairs of the Company. The purchaser or assignee shall only be entitled to receive the share of the profits or other compensation by way of income and the return of contributions to which that Member would otherwise be entitled.

## **ARTICLE 8**

### Separation Scenarios

8.1 Death of a Member. The death of any member shall not cause the dissolution of the Company. The Member's shares will be purchased by the remaining Members, the value of which is paid to the Member's heirs and assigns. The Managing Member Spouse shall have the first right of refusal to purchase the shares of the deceased Member.

8.2 Criminal Misconduct. Should a Member commit criminal misconduct that amounts to a felony and/or undue harm to the ability of the Company to operate, the Member will be subject to immediate expulsion. The remaining Members will purchase the expelled Member's shares at the value of the shares at the time of expulsion.

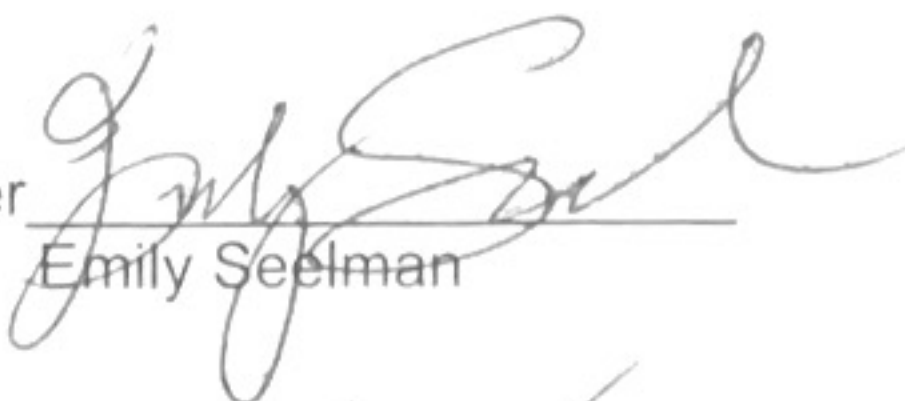
If a Member commits criminal misconduct against the Company, the Member will be subject to immediate expulsion and forfeiture of shares without payment of value of the shares.

8.3 Divorce. Should Managing Member Spouses divorce amicably, the Company continues normal operations. If hostile, both Members separate from the Company upon legal separation and, on the day of finalization of divorce, will be paid the value of shares valued at the time of legal separation.

8.4 Non-participation. If a Member does not perform through agreed upon roles for a period of 3 months (one quarter), the Company is permitted to buy out the member according to the valuation of the business at the beginning of that quarter. Managing Members will first be required to notify the non-participating member, in writing, of the Member's lack of participation with evidentiary proof. The non-participating member will be permitted to provide written evidence as to the performance of his/herself. The remaining Members will be permitted to evaluate the evidence from both Members to determine whether the Member has not been participating.

8.5 Resignation. Any Member may resign at any time upon written notice to the Company. Upon such resignation, the Member may be paid the value of shares at the time of notice of resignation.

Signed and Agreed this 26th day of August 2020.

Member   
Emily Seelman

Member   
Cory Waggoner

**LIMITED LIABILITY COMPANY OPERATING AGREEMENT  
FOR EC DEVELOPMENTS, LLC**

**LISTING OF MANAGERS**

The following Managers were elected to operate the Company pursuant to ARTICLE 4 of the Agreement:

  
Printed Name: Emily Seelman / CEO

1385 Classic Court, Mount Pleasant, SC 29466  
Address:

  
Printed Name: Cory Waggoner / SILENT PARTNER

3201 Brighton Blvd, Unit 387, Denver, 80216  
Address:

The above listed Manager(s) will serve in their capacities until they are removed for any reason by a majority vote of the Members as defined by ARTICLE 4 or upon their voluntary resignation.

Signed and Agreed this 26th day of August, 2020.

  
Member

  
Member



**LIMITED LIABILITY COMPANY OPERATING AGREEMENT  
FOR EC DEVELOPMENTS, LLC**

**LISTING OF MEMBERS**

As of the 26th day of August, 2020, the following is a list of Members of the Company:

NAME:

ADDRESS:

EMILY SEELMAN

1385 Classic Court, Unit 330, Mount Pleasant, SC  
29466

CORY WAGGONER

3201 Brighton Blvd, Unit 387, Denver, 80216

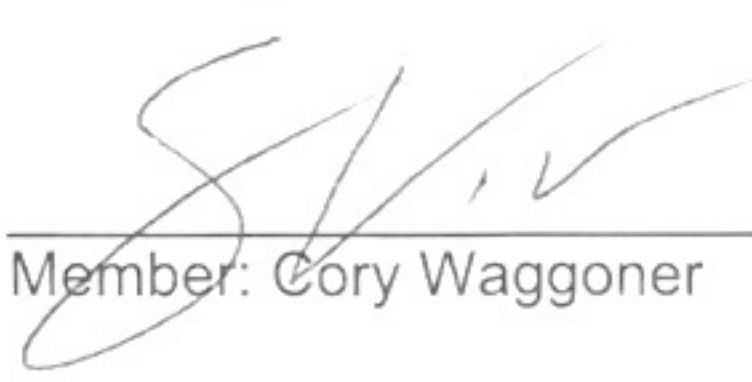
**LIMITED LIABILITY COMPANY OPERATING AGREEMENT  
FOR EC DEVELOPMENTS, LLC**

**CAPITAL CONTRIBUTIONS**

Pursuant to ARTICLE 2, the Members' initial contribution to the Company capital is stated to be 200,000. The description and each individual portion of this initial contribution is as follows:

SHAREHOLDER NAME	POSITION	CONTRIBUTION AMOUNT	
Emily Seelman	CEO	\$190,000	Start-up launch and operational process, application preparation work, site assessment, contract negotiations, operational oversight, property lease payments (land and buildings)
Cory Waggoner	Silent Partner	\$10,000	40 hours of consulting services

SIGNED AND AGREED this 26th day of August, 2021.

  
\_\_\_\_\_  
Member: Emily Seelman  
\_\_\_\_\_  
Member: Cory Waggoner

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

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



369048207

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

EC DEVELOPMENTS  
1385 BERNARDSTON RD  
GREENFIELD, MA 01301-1151

EAN: 22203742  
September 08, 2021

FEIN :87-0898962

The Department of Unemployment Assistance certifies that as of 9/17/2021, EC Developments is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189. This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director  
Department of Unemployment Assistance



### PLAN FOR OBTAINING LIABILITY INSURANCE

Immediately upon licensure, EC Developments will utilize the National Cannabis Risk Management Association (NCRMA), a leading firm providing cannabis business members innovative risk management training and insurance coverage. The NCRMA's extensive education and robust risk management practices have been designed to lower claim rates for its members. Its Appointed Broker program is the only dedicated, cannabis-vetted and appointed broker program in the country. Not only does the NCRMA provide insurance coverage for cannabis businesses, but it also provides its members with benefits that reduce the risk of costly errors and missteps.



EC Developments will 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 deductible for each policy will be no higher than \$5,000 per occurrence. *See* 935 CMR 500.105(10)(a). EC Developments will ensure its ongoing compliance with 935 CMR 500.105(10). Although EC Developments is confident in its ability to maintain insurance coverage, should coverage be unavailable, EC Developments will hold \$250,000 minimum in escrow for liability coverage. Should a withdrawal from escrow be required, it will be replenished within 10 business days.

The NCRMA endorses coverage for businesses like EC Developments that includes,

1. Non-admitted coverage provided through an “A 11” (excellent”) rated carrier by A.M. Best;

2. Comprehensive coverage including:
  - a. Premises liability coverage
  - b. Products/completed operations liability coverage
  - c. Commercial property coverage
    - i. Premises liability
    - ii. Business personal property
    - iii. Business income
    - iv. Equipment breakdown
3. Exclusive premium credit available only to NCRMA members
4. Specialty risk control services tailored to the cannabis industry
5. 48-hour or less service response

### **General liability coverage highlights**

ISO based Occurrence or Claims-Made coverage forms

Special Events Coverage Available

### **Products Coverage Highlights**

ISO Based Claims-Made Coverage form

Zero deductible available

### **Property Coverage Highlights**

ISO Based Form

EC Developments will consider expanded coverage as available and based upon need. These property enhancement endorsement available, including:

- Personal effect and property of others
- Valuable papers and records
- Outdoor signs
- Crime
  - Accounts receivable
  - Employee dishonesty
  - Money and securities (inside and outside premises)
- Equipment breakdown up to property limit
- Inland marine
- Excess policy amounts

EC Developments  
**Business Plan**

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## **I. EXECUTIVE SUMMARY**

EC Developments, LLC is a cannabis operation seeking to develop legally compliant, high quality cannabis to the State of Massachusetts, starting in the Impact Area of Greenfield. We are focused on the local hiring of individuals seeking to engage in the cannabis industry through meaningful employment, the utilization of local organizations for our ancillary needs and buildout support, and the donation of time and financial resources to local organizations in need.

## **II. BUSINESS DESCRIPTION**

EC Developments is a Massachusetts limited liability company applying for cultivation, manufacturing, and retail licenses in the State. EC Developments is in the unique position to develop leading and proficient cannabis operations in Massachusetts through its exclusive relationship with two global cannabis consulting firms: Higher Yields Consulting (HYC), founded in Denver, Colorado and Canna Business Services, founded in Pittsburgh, Pennsylvania. Colorado has been the launching point of the cannabis revolution taking place in the USA today. Pennsylvania marked the expansion of a more stringent, regulatory framework that has expanded throughout the Eastern seaboard and Midwest. Merging the battle-tested expertise of these companies, EC Development is poised to develop some of the top producing cannabis operations in the country, starting in Greenfield, Massachusetts.

### **A. Biography and Background**

#### **EMILY SEELMAN**

FOUNDER & CEO OF CANNA BUSINESS SERVICES

Co-founder & CEO, Networking4Moms nonprofit

Board Member, National Cannabis Risk Management Association



Emily brings with her experience in the start-up industry as well as a legal background. Ms. Seelman attended Grove City College, a highly ranked, nationally recognized Christian private liberal arts and sciences college, known for its rigorous academics. Here, she received her Bachelor of Science degree in Business Marketing, graduating with high honors in Marketing Management and Dean's List with Distinction.

After college, Ms. Seelman attended Duquesne University School of Law and graduated Cum Laude with an award for the highest grade in Expert Evidence. During her time in law school, Ms. Seelman was an Associate Editor for the Duquesne Law Review Journal and received the Distinguished Junior Staff Editor Award. She served as the law school representative for the Pennsylvania Bar Association and Allegheny County Bar Association-Women in Law Division, Vice President of the Christian Legal Society and worked as a student-representative for the Barbri Bar Preparation Company. She was a three-year Merit Scholarship recipient for high levels of achievement.

Ms. Seelman practiced as an Associate Attorney in the Civil Litigation and Employment law sections of the 13th largest law firm in the City of Pittsburgh, working mainly in medical malpractice, contract disputes, employee sexual harassment claims, and commercial property acquisition. Ushering in the cannabis movement in Pennsylvania, Ms. Seelman helped build the firm's legal cannabis team and worked with clients preparing applications for Pennsylvania cannabis establishment licenses.

Seeing a great need in the industry for services that provided the work product of an attorney, without price gouging clients, she founded Canna Business Services (formerly, Tetra Growth Systems).

Since 2016, Ms. Seelman has been working with clients in preparing their applications for cannabis licenses. As a result of her expertise in the industry, Ms. Seelman has been a guest on numerous interviews, podcasts, FM radio shows, magazines, and speaking stages.

Through her company, Ms. Seelman oversees a team of writers with significant experience in cannabis application preparation as well as expertise in law, government contract writing, procurement for the federal government, FDA regulations, education, journalism, and cannabis business operational buildout. Part of her practice is to anticipate legislative and regulatory changes in local, state, and federal laws regarding cannabis and ancillary items affecting the cannabis industry, such as banking, zoning, and compliance standards.

**Non-profit work:**

- Networking4Moms
  - Co-founder and CEO of Networking4Moms, a nonprofit built to bridge the gap between stay-at-home moms seeking to re-enter the workforce and companies

who see the value in the skills acquired by women who have stayed home to raise kids.

- Steel City Hero Hunts
  - Advisory Board member. An organization dedicated to providing fully funded trips for Pittsburgh-area veterans.
- SERT Ministries
  - An all-volunteer nonprofit dedicated to the rescue of trafficked children both domestic and abroad.
- SoapToHope
  - Ongoing contributor. Nonprofit that provides resources to addicts and the homeless of Utah.
- Big Brothers Big Sisters
  - 4 years as a “big sister” to a student of the Big Brothers Big Sisters Program, providing support and resources as her “little sister” navigated the challenges of high school.
- Project Angel Tree
  - While in law school, Ms. Seelman spent 3 years working with Project Angel Tree to provide Christmas gifts to children whose parents or guardians were incarcerated.

**Pertinent Links:**

- Canna Business Services: [www.cannabusinessservices.com](http://www.cannabusinessservices.com)
- Awaken Atlanta FM Radio Show, UI Media Network, “*Weed Saved My Life?*”:  
<https://uimedianetwork.org> <https://www.facebook.com/AwakenAtlantaUIMedia/>
- Cannabis Law Talk Podcast: <https://www.leechtishman.com/podcast-series/cannabis-lawtalk/>
- Tetra Growth Systems, Winner of ICON Innovation Award, Unstoppable Growth Conference: [www.UnstoppableGC.com](http://www.UnstoppableGC.com)
- Cannabis Consulting: Cannabis Commercialization, Post-Covid Compliance and Licensing Essentials for Sustained Growth:  
<https://jrburgess.securechkout.com/tetra-webinar?fbclid=IwAR2ir7Pfx2-2Uwb7MCVJGqSteHF2W39uO1kywmp2LciGyqJy0MXzsFqk274>
- Speaker at Empowering Health Through Medical Cannabis Event:  
<https://www.facebook.com/events/735824723436029/>

- Interview with 420 Beginner Magazine:  
<https://420beginner.com/grow-your-marijuana-business/>

EC Developments looks forward to engaging with local residents of Greenfield, Massachusetts to build out its organization. As is provided below, Greenfield is an Impact Area suffering from expansive unemployment. These individuals have skills that can be trained and well-utilized at EC Developments. Ms. Seelman looks forward to providing these opportunities to the City and changing the landscape of its economy.

## **B. External Support: Global Consulting and CPA Firms**

### **CORY WAGGONER, FOUNDER & CEO OF HYC**

EC Developments has provided 9% equity to Cory Waggoner, for his support in the buildout and development of the property acquired by EC Developments. Although Cory Waggoner will have no direct or indirect authority or control over the company, Mr. Waggoner was provided a small portion of equity for the sweat equity provided to EC Developments through his services.

Mr. Waggoner began his career as an owner and operator of medical marijuana dispensaries when Colorado's medical marijuana program was in its infancy, with patient roles in the mere thousands and very few grows and stores in operation statewide. From 2010-2012 he oversaw Options Wellness Centers' evolution into one of the largest, most efficient medical marijuana cultivation operations in the state as Colorado's patient roles topped 100,000, expanding two cultivation facilities from 2,800 square feet to more than 32,000 square feet total space in just 15 months. Waggoner founded C&C Consulting in 2011 to share his passion for cultivation optimization with Colorado's growing number of medical marijuana dispensaries, improving operations for Lincoln Herbal and Good Humor, both vertically integrated medical marijuana dispensaries in Denver and Boulder. Cory oversaw the sale of both dispensaries and cultivation facilities to new investors and assumed responsibility for Lincoln's daily operations after its transition to new ownership.

In 2015 Waggoner founded HYC – shortly after recreational marijuana was first legalized in Colorado – in response to investors' and business owners' growing need for expertise beyond cultivation design and optimization. With his four-step "Higher Enlightenment" process, Waggoner and HYC provide "seed-to-scale" guidance for the start-up and operation of cannabusinesses in the U.S. and internationally, helping entrepreneurs navigate the complexities of real estate development, permitting, financing, mergers, and hemp and cannabis product sales/distribution. Through HYC, Waggoner has overseen the design or optimization of nearly 2 million square feet of cannabis cultivation and extraction facilities worldwide. Projects include an initial assessment and report to optimize Copperstate Farms, the largest indoor cannabis cultivation facility in the United States; design of THC crude refining operations in the European Union; development of 100 hectare CBD/THC hemp farm in Argentina; and design of a



multi-phased facility in Portugal that, when fully realized, would be one of the largest cannabis cultivation and manufacturing facilities in the world.

Waggoner's team has guided the development and completion of more than 100 successful cannabis licensing and permitting applications, including merit-based licensing applications in 13 U.S. states. HYC currently serves as third party auditors for The Safe Harbor Program (Safe Harbor), the nation's first and only service-based program that specializes in connecting cannabis-related businesses with financial institutions. Safe Harbor provides due diligence, monitoring, and assistance with financial reporting to enable cannabusinesses to have banking relationships that follow FinCEN guidelines, and HYC ensures Safe Harbor's services are delivered in full compliance with Know Your Customer (KYC) guidelines, the Bank Secrecy Act (BSA), and all other applicable regulations.

HYC have been third party auditors to Safe Harbor since 2017, beginning with projects in Colorado from and expanding to audit Safe Harbor operations across the United States. Waggoner's team combines for more than 50 years of experience implementing and auditing Marijuana Enforcement Tracking Reporting Compliance (METRC) and BioTrack, inventory and point-of-sale systems that ensures cannabusiness owners operate lawfully and meet each state's myriad of reporting requirements.

Waggoner continues to place strong emphasis on customer service and client retention at HYC, just as he has since founding his first start up – after graduating from the University of Alabama at Birmingham in 2008. He is also committed to educating and mentoring fellow entrepreneurs to help them succeed in the cannabis space. Through HYC, Waggoner curates and hosts tours of cannabis cultivation and manufacturing facilities in Denver for aspiring business owners, and he is a frequent speaker at industry events, including Elevator Nights Los Angeles, "Smoke and Grow Rich Tour," New West Summit, NCIA, ACAMS California, Berkeley University HAAS MBA Program and other events around the country.

**Certifications:**

- *Key Badge Holder Marijuana Enforcement Division Issued Aug 2011*
- *Compliance Management Training MRM Compliance Issued Sept 2015*

**BRIDGE WEST, CANNABIS-SPECIALIZING CERTIFIED PERSONAL  
ACCOUNTING FIRM**

EC Developments has engaged with the globally recognized, cannabis-specializing Certified Personal Accounting (CPA) firm, Bridge West. Bridge West is one of the first accounting firms in the world to focus solely on the cannabis and hemp industries. It is a full-service firm for accounting, audit, tax, and advisory services. Since 2009, the firm has guided over 400 domestic and international cannabis businesses through rigorous business and regulatory environments.

From inventory management, ensuring tax compliance, and preparing audited financial statements, the firm services many of the challenging issues EC Developments will face as it prepares and builds its operations.

The firm's CEO is a nationally recognized speaker in cannabis tax, accounting, and banking issues, and has been featured on *Fox Business News*, *CNBC*, and numerous other print and radio media outlets. Its Chief Compliance Officer provides consulting services in the areas of inventory costing for tax and accounting, entity structure, and other complex areas. The firm has a four-pronged approach to helping EC Developments navigate the cannabis industry and remain compliant: accounting systems, tax assistance, financial statements auditing, and point-of-sale strategies. Due to its thorough understanding of the banking regulations surrounding the cannabis industry, this firm will ensure that Applicant remains legally compliant with all state regulations, Federal Guidelines (Cole Memo, FinCEN Guidelines and Controlled Substance Act), and inventory management protocol.

### **C. Selected Location**

EC Developments has engaged in an agreement with the property owner of 1385 Bernardston Road in Greenfield, Massachusetts, contingent upon acquisition of its cannabis business licensure from the State. As provided in greater detail below, the City of Greenfield is located in an Impact area due to the financial position of the City. Prior to our proposed use on the property, the property has been used as a sports facility. The sports facility, like many businesses, has suffered severe financial hardship due to the Covid-19 pandemic. The owner is a proponent of adult-use cannabis and supports EC Developments' proposed use of the property. The property encompasses approximately 14 acres of land and has buildings that are easily convertible into cannabis facilities.

### **Greenfield Statistics**

- Population: 17,258/70,180 (Greenfield/Franklin County)
- Unemployment rate: 25.7% / 26.4% (Greenfield/Franklin County) (2020)
- Over 250 feet away from schools
  - Greenfield High School: 3.6 miles
  - Greenfield Middle School: 4.1 miles
- Only 0.6 miles away from Bernardston Police Department
- Located in a Green Zone
- Host Community Agreement, 1% of payments pledged to local nonprofit organizations

As of July, 2020, Greenfield has 4 retailer licenses available for acquisition by interested parties (limited to a total of 8 retailer licenses). EC Developments has obtained its Host Community Agreements with the City and has engaged in a Community Outreach Meeting. All cannabis establishments are required to obtain a special permit from the Zoning Board of Appeals. In compliance with local rules, EC Developments hours of operation will occur never between

10:00PM and 7:00AM and will not be located within a radius of 250 feet of pre-existing public or private school providing education in kindergarten or grades 1 through 12, measured in a straight line from the nearest point of the property line in question to the nearest point of the property line of the cannabis establishment.

### **III. MARKET RESEARCH**

#### **A. Cannabis Industry Overview<sup>1</sup>**

Efforts to combat the long-standing demonization of cannabis in the U.S. have hinged on redefining cannabis as medicine and focusing on the economic and social costs of treating users as criminals. Groups such as the Drug Policy Alliance, the Marijuana Policy Project, the National Organization for the Reform of Marijuana Laws (NORML), and the Coalition for Rescheduling Cannabis have been instrumental in bringing change. Despite the CSA listing cannabis as a Schedule 1 drug with high potential for abuse with no medical use under federal law, California legalized medical cannabis via Proposition 215 in 1996. In 1998 Alaska, Washington, Oregon, and Arizona passed medical cannabis laws and patient protections. Efforts to “re- criminalize” cannabis in Oregon failed with 68 percent of Oregonians supporting their “de-crim” laws. By 2011, Maine, Nevada, Colorado, Hawaii, Montana, Vermont, Rhode Island, New Mexico, Massachusetts, Washington, D.C. (D.C.), New Jersey, Delaware, and Connecticut had passed either medical cannabis or decriminalization legislation.

The modern approach towards cannabis in the U.S. brings with it much hope and potential for effective change. A record 66 percent of Americans now support legalizing cannabis, a dramatic increase from just 12 percent in 1969. There were more than 9,000 active licenses for cannabis businesses in the U.S. in 2017, with the industry employing more than 120,000 people. As more states move to legalize cannabis, these numbers will only continue to rise, potentially providing a new stream of revenue and jobs to local economies. Currently, sales of medical cannabis are strong in states that allow for the legal sale of the product. The demand for medical marijuana is expected to remain strong throughout various economic cycles as people rely on it just as they do other medications. As a result, medical marijuana dispensaries and cultivation businesses clinics operate with strong economic stability. Today, more than 300 million Americans live under state

#### **B. Adult-Use Industry Overview<sup>2</sup>**

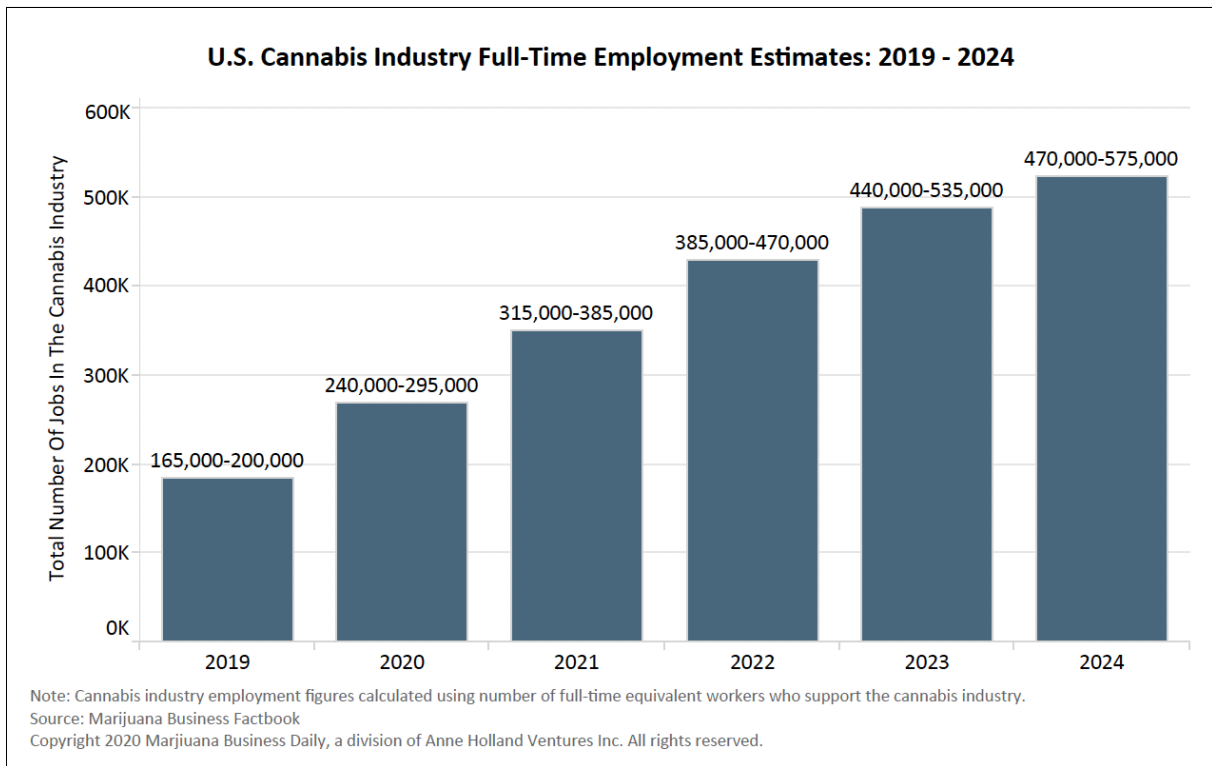
Recreational, or adult-use, cannabis is the inevitable trend of all states. The term “adult-use” is used to describe recreational cannabis markets because not all consumers use cannabis for

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<sup>1</sup> Sources: *Medical Marijuana Access in the United States: A Patient-Focused Analysis of the Patchwork of State Laws*; 2017 Annual Report prepared by Americans for Safe Access; *The National Cannabis Economy: Joint Economic Committee*; December 2018; *Missouri’s Medical Marijuana Market: An Economic Analysis of Consumers, Producers, and Sellers*; Joseph H. Haslag, G. Dean Crader, William Balossi; *HIDTA Marijuana Legalization in the Midwest: The Potential Impact*; March 2019; *Marijuana Business Factbook*; *National Conference of State Legislatures*; *Statista.com*; *BDS Analytics*; *Grand View Research*; *Market Watch*; *MarijuanaSEO*

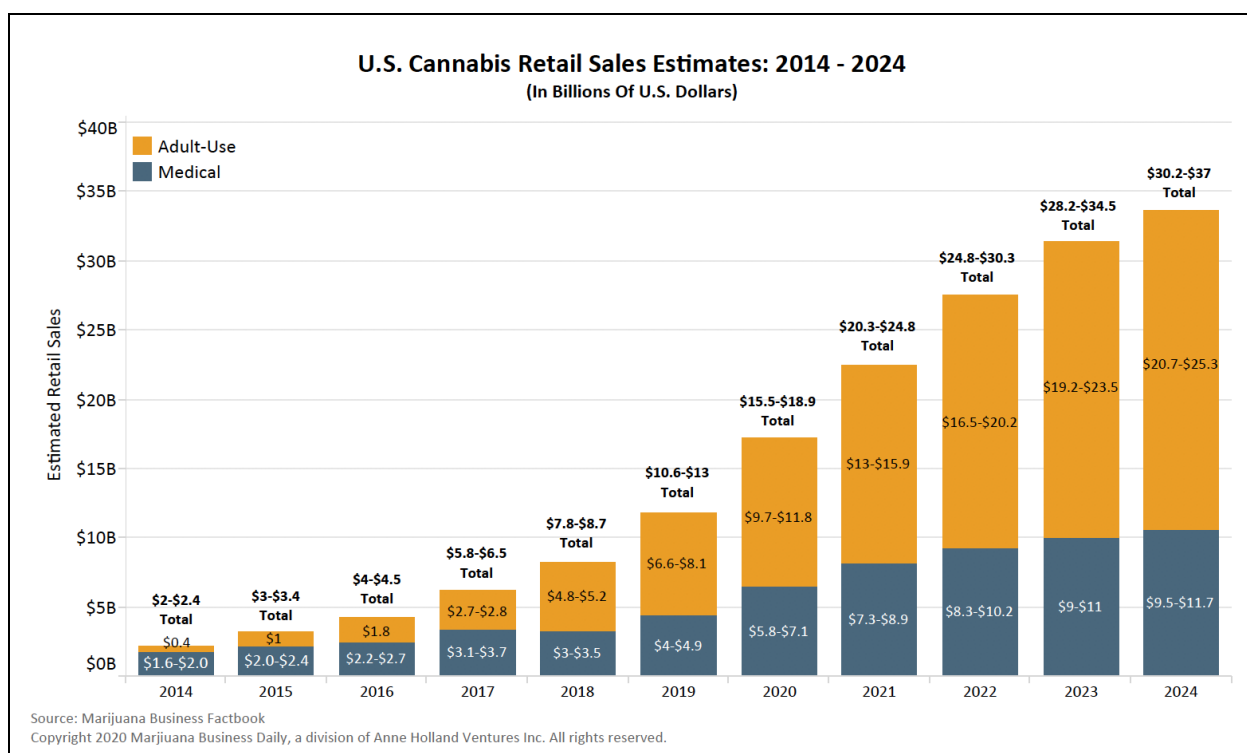
<sup>2</sup> Sources: *MJBiz Factbook*, 2020.

recreational purposes. As of June, 2021, 18 states, plus the District of Columbia and Guam, legalized adult-use cannabis.



*Full-time employment estimates 2019-2024*

Projections showcase the optimism of the adult-use industry. As provided by the above infographic, 2021 is predicted to bring upwards of 385,000 full time equivalent workers. Further, adult-use sales are expected to reach over \$30,000,000,000 (billion), tripling the expected sales of medical cannabis (just over \$10 billion in sales).



*U.S. Cannabis Retail Sales Estimates for Years 2014-2024.*

### C. History of Cannabis Legalization in Massachusetts<sup>3</sup>

The 2016 ballot petition known as “Question 4” became Chapter 334 of the Acts of 2016. It created General Laws Chapter 94G which governs the adult use of marijuana and creates the Cannabis Control Commission (“Commission”). Chapter 334 and G.L. c.94G was amended by Chapter 55 of the Acts of 2017 (also known as The 2017 Act). Under the Act, the Cannabis Control Commission (CCC), established regulations with input from the Cannabis Advisory Board, stakeholders, and the public.

According to The 2017 Act, Cannabis may be purchased at a state-licensed dispensary. Cannabis can be consumed on private property, but marijuana products cannot be smoked, eaten, or vaped in public. Furthermore, cannabis products cannot be smoked where tobacco smoking is prohibited.

The State of Massachusetts Cannabis Control Commission (CCC) began accepting applications on April 1, 2018. Applications are accepted on a rolling basis with no limit to the number of licenses. As of May 20, 2020 there are 9 [license types](#) available:

- Retail Marijuana Dispensary - open. Limited to 8 in Amherst, MA. 5 have been issued.
- Marijuana Product Manufacturer - open and accepted on a rolling basis. No limit.

<sup>3</sup> Sources: Cannabis Control Commission; Mass.gov; Cannabiswire.com

- Medical Marijuana Dispensary - open and accepted on a rolling basis. No limit.
- Marijuana Cultivator - open and accepted on a rolling basis. No limit.
- Craft Marijuana Cooperative (type of marijuana cultivator license) - open and accepted on a rolling basis. No limit.
- Marijuana Transporter - open and accepted on a rolling basis. No limit.
- Marijuana Research Facility - open and accepted on a rolling basis. No limit.
- Laboratories - open and accepted on a rolling basis. No limit.
- Microbusiness (A Microbusiness is a co-located Tier 1 Marijuana Cultivator, and/or Marijuana Product Manufacturer limited to purchase 2,000 pounds of marijuana from other Marijuana Establishments in one year. An applicant cannot have any stake in any other marijuana business in Massachusetts, and a majority of its executives must have been Massachusetts residents for no less than 12 months.) - open and accepted on a rolling basis. No limit.

Based primarily on arrest rates, the Commission has designated 29 cities as *areas of disproportionate impact*. Cities with a population of more than 100,000 people, such as Springfield and Worcester, will be subdivided to reflect that only certain neighborhoods qualify as *areas of disproportionate impact*:

Abington	New Bedford
Amherst	North Adams
Boston*	Pittsfield
Braintree	Quincy
Brockton	Randolph
Chelsea	Revere
Fall River	Southbridge
Fitchburg	Spencer
<b>Greenfield</b>	Springfield*
Haverhill	Taunton
Holyoke	Walpole
Lowell*	Wareham

Lynn	West Springfield
Mansfield	Worcester*
Monson	

\*Asterisks notes that certain neighborhoods to be designated by the Commission.

As provided above, Greenfield has been designated as an Impacted area by the Commission. For this reason, EC Developments specifically sought this area for its operations so as to provide economic improvement to its residents.

#### **IV. COMPETITION, RISKS, AND STRENGTHS**

##### **Competition**

With cannabis dispensary and product data now going back over two years, our surveys of marijuana product availability in major US state markets reveal several clear indicators that the market is growing increasingly competitive and crowded.

One example of this is exhibited by the increase in the variety of branded products available at US dispensaries. Two years ago, the average US dispensary carried 94 different types of branded marijuana products. One year ago, that number had grown to 118, and by January of this year, a typical dispensary carried over 150 different branded products. A more mature market is providing a more diverse offering to cannabis consumers, but this also makes it much more competitive. How does a new entrant get its products on the shelf in a dispensary that already carries 5 competitor brands?

Additionally, the number of unique brands available at US dispensaries gives insight into the changing nature of the market as it matures. Throughout 2016 and into the early part of 2017, the number of brands grew, climbing from the low 1700s into the upper 1800s. However, since the start of 2017, that number has leveled off around the mid-1600s. Why the decline? There is some natural volatility to the market: some products may only be available seasonally, while other brands may fall out of the market after being squeezed out by competitors or otherwise failing to gain traction with consumers. The notable volatility in California at the close of 2017 and early 2018 saw many brands pulled from the shelves as they prepared for the new recreational market and regulations. 2016 was a year of tremendous growth for markets such as California and Oregon, with many brands entering in hopes of establishing a foothold in the booming market. By 2017, the increase in competition forced out many smaller brands, as evidenced by a slight decline in the number of brands available, despite continual increases in the number of dispensaries and products available. EC Developments will make its mark through vertical integration to ensure that our products receive exposure, and through creating unique offerings in the pre-roll space. As more states move toward legalizing marijuana, new opportunities are

opening for individuals to enter the market before it becomes saturated. Thus, EC Developments is seeking opportunities in the Commonwealth of Massachusetts through the acquisition and growth or sale of licenses.

### Risks

The current risks we see include:

- Federal enforcement actions and policy implementation and local ordinances and regulatory limits or changes
- Pushback from politicians
- Lack of access to banking services
- Tax accounting restrictions
- Competition from illegal market sources
- New entrants to the business
- Lack of publicly available data

We will mitigate these risks by:

- Understanding and implementing the federal enforcement actions is part of our core business however, the US DOJ has signaled a policy of noninterference in legal marijuana states
- Positive and fruitful relationship with local city council, planning board, and mayor of Greenfield
- Evaluating 3rd party and developing in house solutions to tackle the lack of access to Tier 1 banking services
- Understanding and implementing 280E tax accounting solutions is part of our core business
- Although we “accept” the existence of illegal market sources as competition, we avoid any interactions and / or relationship with these parties
- New entrants to the business are an inevitable part of the capital consumer markets, whereby we feel we will have a strong advantage with our strategic relationship with HYC and our international divestment.
- With a host of editorial, newspaper, magazine and television articles, reports and surveys, we believe the public vote is beginning to reflect and improve the public’s perception of the industry.

### Strengths

EC Developments brings a number of key strengths to the State. Its CEO, Emily Seelman, Esq. understands the cannabis industry through her years of cannabis consultancy work. Her expertise combines cannabis business start-up support with regulatory compliance, creating the framework for successful business operations. She has surrounded herself with external support, including her team at Canna Business Services, consultant Cory Waggoner, and CPA firm Bridge West.



Together, they bring decades of cannabis-specific experience, including direct operation of cannabis businesses.

Now more than ever, investors are realizing the importance of partnering with the right groups when investing their time, money, and reputation into a cannabis business. The cannabis industry, however, creates complex challenges from idea to customer and leads to changes in resources, processes, data, and tools. More than 92% of cannabis operators experience cost overruns. Over 85% experience schedule overruns. More than 89% received less than half of their expected revenues. The three owners of Colorado cannabis retailer, Sweet Leaf, were sentenced to prison in a landmark case due to the practice of “looping.” 25% of retailers and 35% of distributors in California were suspended over METRC noncompliance.

These inefficiencies and illegal practices are the results of poor planning, underestimation of time and resource requirements, not having the right resources, not understanding or using key features, not setting priorities, inadequate investments in marketing, training, and change management, inadequate performance testing.

EC Developments and the highly skilled team at HYC are compliance experts who will guide us through the complex and ever-changing legal landscape. Local and state laws dictate different business requirements. Over the last 7 years, HYC has developed a proprietary system of checks and balances to ensure we are operating in maximum possible compliance based on local and state laws. From best-practices establishing the appropriate business entities, to establishing correct business operations for tracking inventory and customers records, to internal bookkeeping and government reporting, HYC helps design and maintain industry-leading operations.

Shareholders considering investing in the marijuana industry unequivocally understand the importance of compliance. However, the physical practice of this in the current state of the industry is quite unique. HYC has a “first mover advantage” securing relationships with dispensaries, production facilities and product manufacturers which currently are not in full compliance. These services offer HYC a gateway to potential contracts, partners and/or acquisitions when the legal climate allows. HYC believes that when looking at future growth and operations in California, Pennsylvania or nationwide, it is paramount to note that each state's regulations dictate a different approach. The local and state laws define many ways to adapt the core business models, recognize the unique limitations and therefore opportunities within that state; the laws dictate who can purchase, source, grow, transport, or sell. Knowing the legal landscape and being in compliance is more than critical - it is unconditionally necessary. HYC has determined that the key is identifying similar patterns, strengths and standards in different states, and applying the “Colorado advantage” gained from HYC’s years of experience in this industry. The differences on a state-by-state regulatory basis form barriers to entry for some of our competitors and generate opportunities for us. The legal landscape is both complex and ever

changing. This coupled with the severity of penalties (DOJ, IRS, etc.) are strong barriers to entry and dictate that we operate to the letter of the law.

EC Developments will contract HYC's Compliance Team to ensure ongoing strict oversight of project management with experienced professionals. This oversight will occur in the HYC 3-Phase Approach:

1. Preparation
  - a. HYC will perform a compliance assessment and report.
  - b. An assessment, reconciliation, and report of the inventory tracking system.
  - c. Documentation collection and repository formation.
  - d. Creation of a plan of action, report and strategy.
2. Training and Implementation
  - a. Federal compliance training and implementation.
  - b. General compliance training and implementation.
  - c. Inventory protocols training and implementation.
3. Monitoring and Optimization
  - a. Standard operating procedures review and redline.
  - b. Additional training and evaluation of employee comprehension.
  - c. Compliance processes improvement training.
  - d. Continuous improvement on long-term compliance plan for operation.
  - e. Quarterly project management and compliance processes reporting.

EC Developments will avoid compliance missteps through its allocation of funds, time, and training towards this compliance SOP preparation and oversight.

Section 280E of the IRS code, prevents cannabis producers, processors and retailers from deducting expenses from their income, except for those considered as a Cost of Goods Sold (COGS). Therefore, marijuana businesses are required to determine what expenses are included in COGS and, therefore, what expenses are deductible. To date, very little guidance has been available to help taxpayers make this determination.

On January 23, 2015, the IRS released an internal legal memorandum outlining how Section 280E should be applied in the cannabis industry. Though this memorandum may not be used or cited by taxpayers as precedent it does outline how some IRS officials analyze Section 280E and how to determine COGS. In the memorandum, marijuana retailers and producers are required to compute COGS under inventory rules that predate the enactment of Section 280E. According to the memorandum, a retailer can include in COGS the invoice price of cannabis, less trade or other discounts, plus transportation and other "necessary charges" incurred in acquisition.

A producer may include in COGS direct material costs (such as seeds) and direct labor costs (such as planting, harvesting, sorting, cultivating). Indirect costs are included so long as they are “incidental and necessary for production,” such as the following:

- Repair
- Maintenance
- Utilities
- Indirect labor
- Indirect material and supplies
- Cost of Quality control

In addition, certain other indirect costs may be included (such as depreciation, excise taxes, factory administration expenses, and insurance), depending on accounting treatment. The memorandum outlines a very narrow reading of the cost included in COGS by suggesting that the IRS will not allow cannabis businesses to allocate purchasing, handling, storage and administrative costs to COGS.

The memorandum suggests that a cannabis producer or retailer should be on an accrual basis of accounting unless explicitly allowed to use the cash basis in the tax code (e.g., farmers and certain small businesses). Under the cash basis, a producer generally may deduct costs in the year of payment and includes income in the year cash is received. Under the accrual method, a producer would report income in the year it is earned and deduct costs in the year incurred. Taxpayers need to look at their specific facts to determine the impact of cash accounting vs accrual accounting, but it is important to note that the tax liability difference between these two accounting methods could end up being substantial.

EC Developments will obtain advice and guidance from experienced legal experts in the cannabis space in order to comply with IRS rules and regulations.

## **V. COMPLIANT BRANDING, MARKETING, AND SALES**

After all inspections are completed and certificates are obtained, EC Developments will begin creating consumer awareness and brand adoption through branding, marketing, and demand generation.

### **Branding**

Branding does not exist in a vacuum; it takes place over time. By getting it right from the beginning, a company can avoid brand confusion and wasted money pursuing the wrong customer segments. EC Developments will develop the mission, vision, and values of its cannabis businesses that will foster the EC Developments’s customer-centric and quality-focused reputation. EC Developments will lay the proper foundation through the preparation of a brand guide that outlines each brand and their logos, color palettes, typography, and customer segments.

### Color Pallet

The first impression a consumer has of a product is visual. Thus, color plays an important role in corporate identity. The colors a company chooses are elemental to its brand. They have the potential to capture the eye and the potential consumer's attention just long enough to engage them further.

Some of the most iconic visual brand associations are based on their colors. When people think of the United Parcel Service (UPS), they think brown. In fact, *What can brown do for you?* became the brand's slogan for nearly a decade. Similarly, Pantene color no. 1837 — Tiffany Blue — is synonymous with luxury and expensive jewelry.

When it comes to cannabis branding and marketing, the majority of companies utilize different shades of green and “natural” colors. While there is nothing inherently inferior about those choices, the companies that stand out in the marketplace are those that embrace bold shades, such as spicy orange and neon green.

### Typography

Typography plays an important role in communicating EC Developments's overall tone and quality. Its careful use of typography will reinforce EC Developments's brand personality, while also ensuring clarity and harmony throughout its communications, advertising, and marketing.

### Logos

The best logo images are crisp, clear, and uncluttered. Most importantly, they are memorable and unique. Logo generators churn out tidal waves of images that trend toward the generic, which can cause confusion in their similarity to one another. EC Developments will develop distinctive, custom-designed logos for each brand that connects with the consumer's emotions, energy, or curiosity.

## **Marketing Plan and Demand Generation Strategy**

To some, the terms “marketing” and “demand generation” are synonymous. Although used in similar contexts, the two concepts are not the same. In a general sense, if the goal is demand generation, then marketing is the means by which a business can achieve it.

Particularly, demand generation focuses primarily on building and maintaining customer relationships. According to HubSpot,<sup>4</sup> demand generation is unique due to its “commitment to long-term customer relationships and a strategic mindset.” In the cannabis industry, building and nurturing relationships is vital to making customers happy and brand loyal.

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<sup>4</sup> Source: “What is Demand Generation?”, Hubspot Marketing, R. Puri, Jan. 21, 2014, updated Feb. 13, 2020, <https://blog.hubspot.com/marketing/what-is-demand-generation-faqs-ht>

Developing a solid demand generation strategy is key for cannabis success. With a thoughtful and deliberate strategy, EC Developments will see an increase in new customers over time, and an even greater amount of returning customers.

Marketing is the mechanism that facilitates demand generation. Cannabis marketing has to do with functionally executing strategies, such as printing flyers, posting on social media, and writing blogs. Each of these tools can be used to capture leads and cultivate customer relationships.

EC Developments will utilize the target customer profile built within its Branding Guide, and will focus on the customer's wants, needs, desires, likes/dislikes, and communication methods. Through its Marketing Development Plan, EC Developments will have a goal of introducing a compliant and unique marketing strategy to develop a positive identity for each of its brands. Marketing content will be personalized so as to narrow communication to its customer segment. This one-on-one communication allows EC Developments to directly interact with leads and begin to offer solutions to their needs and wants.

EC Developments will comply with standard cannabis regulations and the FDA in the development of its labeling and branding. For example, according to the National Association of Cannabis Businesses (NACB), cannabis business advertisements cannot appeal to minors. Packaging and labeling cannot contain colors or characters that would be attractive to children (e.g., cartoon characters).

While remaining in compliance with regulations surrounding marketing and advertising, EC Developments will develop a compelling website equipped for Search Engine Optimization (SEO) and social media platforms. Creating engaging content is what will support EC Developments's ability to connect with the consumer. Therefore, it will utilize professional videos, blogs, vlogs (video blogs), and podcasts focusing on customer-centric topics.

## **VI. COMMUNITY WELFARE**

EC Developments seeks to provide opportunities for growth and aid to those living in low income areas. Through our Community Outreach Programs as described below, we hope to revitalize the community, provide aid to those who cannot adequately care for themselves, and continually use profits to give back to the community.

### Community Relations

We seek to support our customers and substantially improve the welfare of communities in which they operate. It is the principal goal of the company to develop a reputable establishment and maintain operations as an upstanding corporate citizen and firmly rooted community leader. We are committed to reforming public perception of cannabis use and will provide all necessary measures to respect the comfort and dignity of our customers.

To ensure the effective Community outreach and relations efforts are critical components of a successful cannabis business development. Effective community relations planning is a continuous process that involves ongoing revisions and improvements. It is essential for new cannabis businesses to form and sustain healthy relationships with members of their communities to further the re-education of public perceptions of cannabis use and to maintain a respectable operational status.

Cannabis businesses of our projected community relations plan, additional measures will be developed for increased range of involvement in outreach and improvement efforts detailed below. We have initiated preliminary integration efforts by identifying gaps in localized resources and engaging in progressive relationship-building conversations with municipal authorities and residents.

In addition to our commitment to the betterment of the community at large, we are equally committed to establishing and sustaining dedicated ties between local and national wellness-centric cannabis community leaders.

#### **A. Program Development, Implementation, and Expansion**

##### **Program Development**

We will engage in productive community relationship-building efforts throughout the initial business development process and proceed to strengthen its network of agents, patients, vendors, neighbors and local business associations as a continuous business practice. Community relations measures in addition to those detailed below will be developed as new opportunities or amenable community service deficiencies in the community are identified.

##### **Implementation**

To facilitate the implementation of the Community Relations Plan, We will develop a strategic timeline containing a projected schedule of service events and available information concerning the initiation of those measures with potential for immediate application. At a minimum, initial efforts to expedite the actionable community services, events, networking and charitable contributions detailed in this section will be launched within the first year of operations.

##### **Expansion**

As we evolve to become an integral community member valued by individuals and businesses throughout the community, the company will take measures to ensure the sustained success of the community relations program. In addition to those standard policies and procedures detailed below, the company will continue to conceptualize new services, events, charitable contributions and additional offerings of value to the community. Our Community Relations Plan will

frequently be revised to include detailed policies and procedures for other contributions and services added to our program offerings.

### Philanthropic Giving

- *Direct Giving:*
  - We are committed to donating a portion of net profits to local charitable organizations once profitable. This fund will assist local organizations whose missions align with the primary giving goals of the Company. These funds will be allocated to the organizations quarterly.
- *Fundraising Events:*
  - We recognize the value of a strong business network when engaged in fundraising efforts for local charitable organizations designated to receive regular donations. Establishing a reputation for hosting regular, successful fundraising events for community organizations will also increase the ability of the company to compel corporate sponsorships and donations for future events.
  - We will regularly host fundraisers to increase visibility and awareness of select charitable organizations within the community. Events will be centered on the local community and will encourage widespread participation by appealing to a broad audience and benefitting our chosen charities by hosting and sponsoring events like golf tournaments, bike and walk events, art auctions, and farmer's markets. The company will ensure programs and events are compliant with Department regulations.
- *Cannabis Research and Education Funding:*
  - A portion of net operating profit will be allotted for the development of a fund supporting the advancement of research and continuation of progressive cannabis studies. An independent board will grant awards to scientists, policy organizations, colleges and universities, advocacy groups and other institutions working to advance cannabis research. We are committed to partnering with law, science, research and business programs to develop advancements in cannabis policy, plant and lighting science, environmental science, and engineering. The Company will additionally assist in developing curriculum to teach the next generation of cannabis innovators.
- *Volunteer Service:*
  - The company's agents are encouraged to participate in volunteer activities. All full-time staff members are provided one paid day per month for volunteer work (approved by Human Resources).



- *Local Outreach and Community Improvement:*
  - We are committed to building a professional reputation among local merchants and maintaining strong relationships with small businesses in the community. During the process of initially establishing the company, efforts will be pursued to engage with local and neighborhood merchants' associations. Membership with such associations will be maintained as a vital component of the operational practices of the company, including attendance at regular meetings and participation in community programs.

## **VII. CONCLUSION**

EC Developments represents a unique moment in history – one that rivals the repeal of prohibition, with the power and dynamics of an upstart industry, accelerated even more by the existence of internet-based business methods and social media. Reports show the United States cannabis market is currently developing faster than the smartphone and tablet industry and is ushering in a new era of early investors to compliment this revolution. EC Developments believes this is one of the most exciting eras in investing history.

We are living in an age of uprising, of revolution, of new ideals. Cultural relevancy is on everybody's minds and lips. Smart investors are doing their homework; and we're thankful that you've taken the time to learn our story and consider us as a part of your portfolio. Early movers in this multibillion- dollar market will surely have an advantage. Several large public companies have already reached sufficient size to list on the NYSE and a number of smaller entrants are trying to make their mark. The Cannabis industry is now in its adolescence, and new entrants such as EC Developments can benefit from lessons learned during the industry's infancy.

## QUALITY CONTROL AND TESTING

1. EC Developments' Comprehensive, Compliance-Centric Cultivation Plan Assembled by World Renowned Experts in Cannabis Cultivation Ensures Accurate Cultivation of Unadulterated Cannabis, Quality Control and Assurance Testing, and Compliance with Applicable Regulations and Law

EC Developments has designed a multi-faceted *Cannabis Quality and Contaminant Testing Plan* (CQCTP) consisting of quality control systems and testing processes to ensure cannabis and cannabis products are contaminant-free and safe for use. EC Developments' *Cannabis Products Quality Assurance* standard operating procedures (CPQA SOPs) have been drafted in accord with all applicable Cannabis Control Commission (the Commission) regulations. EC Developments' CPQA Plan features sanitation processes and protocols for both the facility and employees.

This robust testing plan will ensure EC Developments' products are also produced consistent with current good cultivation practices, and are held to rigorous testing standards. Accordingly, cannabis product testing will include analysis for potency, terpenes, heavy metal, solvents, pesticides, microbial contamination and shelf life. Immediately prior to cultivation or natural processing of any cannabis or cannabis-infused product, or packaging thereof for sale to a retail facility, each batch will be randomly sampled and tested internally, as well as by a Commission-approved independent testing laboratory for contaminants and active ingredient analysis.

The Chief Compliance Officer (CCO) and Chief Operating Officer (COO) will jointly oversee the Cultivation Plan and quality assurance protocols, while the Quality Assurance Manager (QAM) and Cultivation Manager (CM) will share responsibility for implementation on a day-to-day basis. Both managers will report to both the COO and CCO.

EC Developments has designed a multi-faceted CQCTP. This robust plan consists of quality control systems and testing processes to ensure cannabis and cannabis products are contaminant-free and safe for use. Likewise, EC Developments' CPQA SOPs have been drafted in accord with all regulations set forth by the Commission. EC Developments' CPQA Plan features sanitation processes and protocols for both the facility and employees.

EC Developments will implement quality systems controlled by SOPs and based on standards processes that are critical to product safety. EC Developments' quality control protocols and SOPs address the myriad of product safety requirements including, but not limited to, employee training requirements, proper equipment usage and maintenance protocols, sanitation standards, cultivation protocols, component and product handling and storage, quality control testing, and child-resistant packaging, product inserts, label disclosures and product traceability requirements as previously described.

The QAM will be responsible for day-to-day implementation of these quality systems, while the CCO will ensure that protocols comply with the Commission, Department of Health, and other state and federal regulatory agencies. EC Developments' SOPs provide for regular updates to all sanitation and testing measures, regular onboarding education, training and reinforcement for all members, and easy on-site and electronic access to all employees. The CCO is primarily responsible for incorporating into the SOPs any additions or amendments to regulations and guidance or directives, and for staying current with best practices. The QAM is responsible for any updates to quality control measures and for ensuring department managers immediately implement these updates. All of EC Developments' employees will undergo onboarding and regular training on the SOPs applicable to their duties. Before performing any operation within EC Developments' facility, employees will be required to demonstrate comprehension of the CPQA SOPs.

All plans and SOPs will be centralized and controlled at EC Developments' cultivation facility, making them readily available for inspection by the Commission at any time upon request.

(a) Facility Layout Designed for Seamless Cultivation Operations, Product Safety, and Sanitation

EC Developments knows the quality of the cannabis product dispensed to any customer will ultimately be a function of the quality of that cannabis crop, and the quality of the cultivation methods. EC Developments purposefully selected a property and proposed a buildout that will accommodate all operations in the same facility which will be designed to provide a stream-lined, quality-controlled operational environment. This will facilitate quality control and full spectrum compliance-- from cultivation, to production and packaging. All rooms in the facility are arranged in accord with each stage of the plant life cycle and the floor plan layout aligns with order or flow of operations.

The COO and CCO will share primary responsibility for maintaining safe, sanitary and compliant facilities. The QAM will report to both executives, and is responsible for maintaining and overseeing day-to-day adherence to CPQA SOPs which are expressly designed to prevent contamination operation-wide. All floors, walls, and ceilings will be constructed to allow them to be kept clean and in good repair at all times. Adequate space and safety lighting will exist in all processing and storage areas, as well as areas where equipment or utensils are cleaned. Likewise, buildings, fixtures, and other physical facilities will be maintained in a sanitary condition at all times. A high-level summary of the safety, sanitation and compliance features of EC Developments' facility appear below.

(i) Water Supply

EC Developments' water supply will be sufficient for chosen operations, and will be derived from a source that is a regulated water system. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet cultivation and production needs.

(ii) Plumbing

Similarly, EC Developments' plumbing will be of adequate size and design, as well as adequately installed and maintained, to carry sufficient quantities of water to required locations throughout the facility. Plumbing will properly convey sewage and liquid disposable waste from the facility. No cross-connections between the potable and wastewater lines will exist. Waste treatment and disposal systems will be maintained in good working order so that they do not constitute a source of contamination in any area.

(iii) Hand-Washing Facilities

Likewise, plumbing, bathrooms, and hand-washing facilities will be compliant with local ordinance and codes and be properly maintained. All drain areas will be maintained so that they do not contribute to the contamination of any cannabis, cannabis products or contact surfaces by seepage, filth or any other extraneous materials or by providing a breeding place for pests. Hand-washing facilities will be adequate and convenient, and furnished with running water at a suitable temperature. Hand-washing facilities will be located in the licensed premises where good sanitary practices require employees to wash and/or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service.

(iv) Restrooms

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EC Developments' newly constructed facility will provide adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair. An employee appointed by the QAM will perform or oversee a daily walkthrough to ensure toilets, hot running water, toilet paper, disposable towels and soap are available at the facility. Regular maintenance will be scheduled by the QAM to ensure toilet facilities are maintained in a clean and functioning condition to ensure that cannabis is protected from contamination due to personal hygiene.

(v) Ventilation Systems

The QAM will ensure each facility has adequate ventilation and contains equipment for adequate control over air pressure, microorganisms, dust, humidity, and temperature. The QAM will also ensure the facility utilizes sufficient filtration systems.

(vi) Screening to Prevent Pets and Animals

Animals are prohibited from the facility, except the service dogs of approved visitors and employees may be permitted in some areas of the facility if no risk of contamination of cannabis, cannabis products or contact surfaces exist. EC Developments' facility will have adequate screening or other protection to protect against the entry of pets and pests.

(vii) Pests Prevention\*

As discussed fully above, EC Developments' new facility will be designed, managed and monitored to keep out pests, including insects, rodents, and other animals. For example, litter and waste will be promptly removed and disposed of to minimize the development of odor and potential for attracting and harboring pests.

(viii) Cleaning and Sanitizing Employees

\*However, insecticides, fungicides or rodenticides will not be used in or around the facility unless registered with the Commission, as may be required, and then only in accordance with labeled instructions and EC Developments' safety protocols. Likewise, toxic cleaning compounds, sanitizing agents, solvents used in the cultivation of cannabis concentrates, and pesticide chemicals will be identified, held, and stored in a manner that protects against contamination of cannabis.

(ix) Regular Facility Cleaning and Maintenance

Per EC Developments' CPQA SOPs, the QAM will be responsible for proper facility maintenance that ensures safe and sanitary conditions for cannabis product cultivation. The floors of the facility will be kept clean at all times using an approved cleaning solution (*e.g.*, Simple Green with or without bleach), followed by a disinfectant wipe. Solutions used to clean the floor will be removed immediately using a mop or similar tool. Standing water will be addressed immediately. Butcher paper will be placed on the floor during any procedure to minimize clean-up effort. The walls of the facility will be disinfected weekly with denatured alcohol mixed with Sanidate liquid disinfectant per label instructions.

The requirements for regular facility maintenance appear below, and will be maintained in written and electronic form by the QAM and designees:

SOP: Maintenance of Contact Surfaces, Utensils, and Equipment	
Roles	Quality Assurance Manager and Designated Employees
<input type="checkbox"/>	Floors cleaned and disinfected at all times Floor-cleaning solutions removed immediately Floors free of standing water
<input type="checkbox"/>	Walls disinfected weekly
<input type="checkbox"/>	Work areas clean, dry, and free of algae and other clutter and trash

<input type="checkbox"/>	Trash removed from critical areas immediately
<input type="checkbox"/>	Roads to facility free of trash and debris that border, irrigate dirt roads to reduce dust and use slow speeds
<input type="checkbox"/>	Weeds and pest habitats around facility eradicate
<input type="checkbox"/>	Trees, bushes and other foliage outside do not allow for a person or persons to conceal themselves from sight
<input type="checkbox"/>	If facility is bordered by grounds not under EC Developments' control, and if those other grounds are not maintained adequately, care will be exercised by Cultivation Manager through inspection, extermination or other means to exclude pests, dirt, filth or any other extraneous materials that may be a source of contamination.

The QAM is also responsible for ensuring that the *Facility and Equipment Maintenance Schedule* is current and all schedule items are addressed in a timely fashion. Employees will immediately stop work involving any facility or equipment component that becomes unsafe for any reason. The QAM will address the unsafe component and notify staff when work can commence. Security equipment will be fully functional at all times. The QAM will inspect security equipment daily, and complete repairs or adjustments immediately to restore functionality.

(x) Litter and Waste

Litter, rubbish, and waste will be properly removed, and the operating systems for waste disposal will be maintained in an adequate manner so that they do not constitute a source of contamination in areas where cannabis plants are exposed. Rubbish will be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage or breeding place for pests.

(xi) Sanitation of Contact Surfaces, Equipment, Utensils

All contact surfaces, including utensils and equipment used for the cultivation and harvesting of cannabis will be sanitized as frequently as necessary to protect against contamination. Equipment and utensils will be designed and made of material and workmanship that is adequately cleanable, and will be properly maintained.

	<b>SOP: Maintenance of Contact Surfaces, Utensils, and Equipment</b>
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Role	All Management and Quality Assurance Manager
1	Any substances required for equipment operation, such as lubricants or coolants, do not come into contact with components, product containers, cannabis or cannabis products so as to alter the safety, identity, strength, quality or purity of the cannabis or cannabis products beyond the official or other established requirements.
2	Any substances required for equipment operation, such as lubricants or coolants, do not come into contact with components, product containers, cannabis or cannabis products so as to alter the safety, identity, strength, quality or purity of the cannabis or cannabis products beyond the official or other established requirements.
3	Equipment and utensils are designed and of such material and workmanship as to be adequately cleaned and maintained.
4	Equipment and utensils are cleaned, maintained and, as appropriate for the nature of the cannabis or cannabis products, sanitized using a sanitizing employee registered by the EPA, in accordance with labeled instructions and sterilized at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the cannabis or cannabis product beyond the official or other established requirements.
5	Written procedures are established, updated, and followed for the cleaning and maintenance of equipment and utensils used to cultivate, process, package or hold cannabis or cannabis products, including: assignment of responsibility for cleaning and maintaining equipment; maintenance and cleaning schedules, including, where appropriate, sanitizing schedules; a description in sufficient detail of the methods, equipment, and materials used in cleaning and maintenance operations and the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance; protection of clean equipment from contamination before use; inspection of equipment for cleanliness immediately before use. Records of all equipment maintenance are maintained.
Role	All Employees Utilizing Tools for Cultivation
	<b>Utensils, equipment and contact surfaces will be cleaned and sanitized by the employee(s) responsible for using the materials during a</b>



	<b>cultivation procedure. The sanitation procedure and schedule is as follows:</b>
1	Before any cultivation procedure is performed, the employee will inspect all equipment and contact surfaces to ensure cleanliness before use
2	After each procedure, the employee will wash, rinse and sanitize all removable equipment components and all other tools used during the cultivation procedure
3	Rinse, scrape or soak all items before washing
4	Wash items in a detergent solution. Use brush, cloth or scrubber to loosen and remove soil
5	Rinse the washed items. Make sure all traces of food and detergent are removed
6	To sanitize the washed and rinsed items, wipe with 70% isopropanol, or equivalent. A chemical sanitizer will be mixed to the proper concentration to be effective, so follow the manufacturer's directions for proper use
7	All washed, rinsed and sanitized items should be placed on a clean surface to air dry
8	Employees will thoroughly wipe down all contact surfaces used or exposed during the cultivation procedure using a fresh 70% isopropanol solution, or equivalent

(xii) Facility Sanitation and Employee Hygiene

The COO will have ultimate responsibility for ensuring that all facilities are maintained in sanitary conditions to optimize the safety of employees, visitors, and cannabis products. Department managers will maintain written procedures describing in sufficient detail the cleaning schedules, methods, equipment and materials to be used in cleaning the facilities. Written procedures will be followed, and records of cleaning and sanitation will be kept in the Facility Maintenance Schedule overseen by the QAM. All contractors will be informed of and held to sanitation standards while working on EC Developments' premises. All employees will be required to report any unsanitary conditions in the facility to their respective manager. Critical areas will be clean and free of any contamination risks at the end of each shift.

Any mold found in the facility will be addressed by a mold removal expert immediately. Department managers will ensure employees are trained in proper personal hygiene, with

specific attention to preventing microbial contamination of handled cannabis. The QAM will ensure hygiene policies are enforced including, but not limited to, employees' health and cleanliness, hand-washing areas and hand-washing requirements.

(xiii) Plant Care to Mitigate Against Contamination Risk

EC Developments will also implement SOPs and measures to avoid contamination of cannabis plants. EC Developments' CM and QAM will be responsible for overseeing all plant care, and for implementing *Plant Care* SOPs to optimize plant quality and safety, as more specifically described here:

<b>SOP: PLANT CARE</b>	
<b>ENVIRONMENTAL CONTROLS</b>	
<ul style="list-style-type: none"> <li>• Ensure doors are closed completely to keep areas sealed</li> <li>• Each cultivation employee will be trained to adjust temperature and relative humidity levels</li> <li>• Maintain proper distance between plant canopy and light fixtures.</li> </ul>	
<b>CULTIVATION AND PRODUCTION AREAS</b>	
<ul style="list-style-type: none"> <li>• Do not overcrowd plants in cultivation areas</li> <li>• Keep all cultivation areas free of plant litter, spilled dirt, equipment, etc.</li> <li>• Thoroughly disinfect areas weekly and after each harvest.</li> </ul>	
<b>PLANT ATTENTION</b>	
<ul style="list-style-type: none"> <li>• Cultivate disease resistant strains whenever possible</li> <li>• Dispose of infected plants, do not move them into any clean areas, according to regulatory agency regulations</li> <li>• Isolate cuttings, seeds, and mother plants away from propagation areas</li> <li>• Check cuttings daily for rot, discard any cuttings with lesions or low root mass</li> <li>• Plant density is crucial to yield. Ensure plants have lateral room for branching</li> <li>• Ensure plant foliage is dry prior to dark periods</li> <li>• Irrigate plants as early in the light period as possible and adjust irrigation levels seasonall</li> <li>• Inspect each cultivation area daily for signs of abiotic and biotic disorders.</li> </ul>	
<b>PEST DISEASE AND MANAGEMENT: METHODS</b>	

- Soil, media, and crop nutrient management practices contained herein
- Sanitation measures to remove disease vectors and habitat for pest organisms
- Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
- Practices which suppress the spread of disease organisms, or
- Application of biological, botanical, or mineral inputs.

(c) Additional Quality Control Measures Processes to Ensure Safe Production and Preparation of Cannabis

(i) Employees Prohibited from Handling Cannabis

EC Developments will not permit employees who work in any product handling operation, who, by medical examination or supervisory observation, appear to be sick, or have open wounds, sores, or skin infections.

(ii) Prevention of Foodborne Cases of Viral Gastroenteritis

Food handling employees who test positive for Norwalk virus, Norwalk-like virus, norovirus or any other calicivirus may not handle food or cannabis for either 72 hours past the resolution of symptoms or 72 hours past the date the positive specimen was provided, whichever occurs last. In outbreak circumstances consistent with Norwalk virus, Norwalk-like virus or other calicivirus infection, affecting customers or employees, all employees may be required to provide stool specimens for testing.

(iii) Safety Precautions and Protocols for COVID

At EC Developments' facility, the health and safety of customers and employees is paramount. In response to the COVID-19 pandemic, executive leadership has prioritized the development of a comprehensive, enterprise-wide safety plan to mitigate against the known risks of transmission. These preventative protocols and precautionary measures are modeled after the existing *Customer and Product Safety* SOPs, and are outlined below. All decisions related to COVID-19 will be based on science, best compliance practices, and Centers for Disease Control and Prevention (CDC) guidelines. EC Developments will always air on the conservative side of caution, and do what is in the best interest of customers and employees. Finally, EC Developments will engage the services of a COVID compliance expert to review and oversee the implementation of the COVID-19 Safety Plan (C19SP).

(iv) Masks and Personal Protective Equipment (PPE)

Though these regulations are frequently shifting, EC Developments will strictly follow CDC guidelines, and all state and local rules and guidelines. Certain PPE is required depending on

cleaning products used, including, but gloves, gowns, safety glasses, face coverings, hair coverings, shoe coverings, etc. Floors will be marked with tape or other labels to demonstrate proper social distances. Cultivation agents who handle cannabis will be required to wear PPE such as Tyvek coveralls; this ensures the mitigation of unwanted outside pests, molds, and pathogens.

(v) Personal Hygiene Measures

Good hygiene, especially frequent hand washing, helps to prevent the spread of illness, especially COVID-19. All EC Developments employees will be required to follow proper hygienic measures described below.

Employees are to wash their hands frequently with soap and warm water for at least 20 seconds:

- Before and after work shifts;
- Before and after work breaks;
- After handling money, before performing another activity;
- After blowing their nose, coughing, or sneezing;
- After using the restroom;
- Before eating or preparing food; and
- After putting on, touching, or removing cloth face coverings.

EC Developments will display placards, images, and a short video demonstrating proper hand-washing techniques, and will ensure employees have easy access to handwashing areas. Additionally, touchless stations will be set up facility-wide with hand sanitizer that contains at least 60% alcohol. The following protocols for cleaning uniforms, PPE and other laundry will be implemented.

- All EC Developments-issued items to be laundered should remain on the premises.
- Changing areas will be provided and sanitized regularly.
- Clean and dirty laundry should be separated in clearly labeled bins.
- Employees should wash their hands immediately after touching dirty laundry.
- Personally-owned masks or PPE must be washed thoroughly, according to the directions, and after each use.

(vi) In Person Employee Interaction

Employees will be expected to comply with the following guidelines for all employee interactions whenever feasible. These guidelines will be frequently adjusted and clarified as needed based on evolving state, local and federal regulations.

- Virtual meetings and telework will be encouraged and implemented as much as possible.
- If an in-person meeting is absolutely necessary, employees will be seated six feet apart and wear face coverings, as described above.
- All surfaces with which employees come in contact will be wiped down before and after each use.

- For contact tracing purposes, an accurate accounting of who was present at each meeting will be maintained for at least one month.
- Arrival times, breaks, lunch, and departure times will be staggered to limit employee interactions.
- Elevators and stairwells will be limited to two people at a time.
- Restroom capacity will be reduced by 50%.
- Physical signature requirements will be eliminated if unnecessary or replaced with a touchless practice.

(vii) Reporting to Local Health Department

Any manager or executive who knows or has reason to believe that an employee has contracted any disease transmissible through cannabis or food or has become a carrier of such disease, will report to the local Department of Health immediately.

(viii) Contact with Cannabis

In strict compliance with the Act, any employee working in direct contact with the preparation of cannabis materials or cannabis products will maintain adequate personal cleanliness including clean and appropriate work clothing, trimmed and clean fingernails (without polish or gloved) and wearing protective apparel as directed by a department manager, as is necessary to protect cannabis and cannabis products from contamination. The employee will also wash hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated (*i.e.*, after restroom breaks or handling cash). Cannabis that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms. As such employees will be required to wear protective gloves when handling cannabis and cannabis products, and will be required to adhere to the below hand-washing policies.

(ix) Hand-Washing Policies and Procedures

In addition to stopping the spread of communicable diseases, maintaining adequate personal cleanliness, particularly with respect to hand-washing is critical for maintaining sanitary operations suitable for cannabis product operations. As such, instructive hand washing signs in multiple languages will be clearly displayed and maintained in appropriate areas such as bathrooms, kitchens and lunch areas. Department managers will enforce hand-washing policies, and employees are encouraged to self-monitor. EC Developments will also post the following instructive SOP.

SOP: Employee Hand-Washing Procedure	
Role	All Employees Engaged in the Cultivation, Extraction, and Infusion of Cannabis and Cannabis Products

<b>1</b>	Clean exposed portions of arms, including surrogate prosthetic devices for hands and arms, for at least twenty (20) seconds using cleaning compound in hand-washing sink
<b>2</b>	Apply amount of cleaning compound recommended by manufacturer
<b>3</b>	Rub together vigorously for at least fifteen (15) seconds while paying particular attention to removing soil from underneath the fingernails during the cleaning procedure; and creating friction on the surfaces of the hands and arms, fingertips and areas between the fingers
<b>4</b>	Thoroughly rinse under clean, running water
<b>5</b>	Immediately follow the cleaning procedure with thorough drying

2. Testing Protocols for Microbiological Contaminants, Mycotoxins, Heavy Metals, and Pesticide Chemical Residue, and Active Ingredient Analyses

EC Developments will test for the following: microbial, mycotoxin, metals, pesticide, and “active ingredients”. The active ingredients are analyzed in the cannabinoid and terpene analysis, and the rest must be performed by a variety of methodologies by a certified independent laboratory. These tests each have specific pass/fail criteria for each batch. EC Developments has adopted the minimum acceptable limits described below, unless otherwise directed by future legislation or regulation. If a sample of cannabis fails the pesticide chemical residue test, the batch will be recalled and disposed of in accordance with EC Developments' secure disposal plan. If a sample of cannabis is found to be contaminated per the tolerance limits of the other testing requirements, the QAM will recall the batch and provide a retest. If the batch fails the retest, the batch may be used to make a CO<sub>2</sub>-based or solvent based extract. The QAM will require the extract to pass all testing. If the batch fails testing, the QAM will ensure its secure disposal in accordance with waste disposal procedures and regulations.

A cannabis sample will pass if it satisfies the recommended microbial and fungal limits for cannabis products in colony forming units per gram (CFU/g) set out in the American Herbal Pharmacopoeia Monograph Table as follows:

(i) Microbiological Test

	<u>Total viable aerobic bacteria</u>	<u>Total yeast and mold</u>	<u>Total coliforms</u>	<u>Bile-tolerant gram-negative bacteria</u>	<u>E. coli (pathogenic strains) and Salmonella spp.</u>
<u>CO<sub>2</sub> and solvent based extracts</u>	<u>10<sup>4</sup></u>	<u>10<sup>3</sup></u>	<u>10<sup>2</sup></u>	<u>10<sup>2</sup></u>	<u>Not detected in 1 g</u>

Unprocessed materials include minimally processed crude cannabis preparations such as inflorescences, accumulated resin glands (kief), and compressed resin glands (hashish). Processed materials include various solid or liquid infused edible preparations, oils, topical preparations, and water-processed resin glands (bubble hash).

EC Developments will dispose of the entire batch from which the sample was taken if the sample of cannabis product does not pass the microbiological, mycotoxin, heavy metal, or pesticide chemical residue test. For purposes of the microbiological test, a sample will be deemed to have passed if it satisfies the standards set forth in Section 1111 of the United States Pharmacopeia.

(ii) Mycotoxin Test\_\_\_\_\_

For purposes of the mycotoxin test, a cannabis sample will be deemed to have passed if it meets the following standards:

Test	Specification
Aflatoxin B1	< 20 µg/kg of substance
Aflatoxin B2	< 20 µg/kg of substance
Aflatoxin G1	< 20 µg/kg of substance
Aflatoxin G2	< 20 µg/kg of substance
Ochratoxin A	< 20 µg/kg of substance



(iii) Heavy Metals\_\_\_\_\_

For purposes of the heavy metals test, a cannabis sample will be deemed to have passed if it meets the following standards:

Test	Specification
Metal	Natural Health Products Acceptable Limits uG/KG BW/Day
Arsenic	< .14 µg/kg of substance
Cadmium	< .09 µg/kg of substance
Lead	< .29 µg/kg of substance
Mercury	< .29 µg/kg of substance

(iv) Pesticide Chemical Residue

For purposes of the pesticide chemical residue test, a cannabis sample will be deemed to have passed if it satisfies the most stringent acceptable standard for a pesticide chemical residue in any food item as set forth in subpart C of US EPA's regulations for Tolerances and Exemptions for Pesticide Chemical Residues in Food [40 CFR 180 (2014)].

(v) Acceptable Test Results

Only the batches from which the samples that pass the microbiological, mycotoxin, heavy metal, and pesticide chemical residue test were derived, may be utilized by the processor for immediate processing, packaging, and labeling for sale.

(vi) Active Ingredients Analyses

A sample of cannabis extract or formulated cannabis product will be tested and quantified for the relative amounts of the various cannabinoids present (THC, THC-A, CBD, CBDA). This will be critical for not only label-making and formulation, but also compliance with strict state guidelines as to the allowable concentration of certain cannabinoids, namely THC. With a properly validated method, the cultivation team can quickly and easily collect data from their process to know the content of agricultural cannabis, extracted cannabis, and formulated cannabis products, and make any necessary adjustments or corrections to their standard procedure to adjust their final concentrations to stay within state requirements.

In addition to LC-PDA analysis of cannabinoids, terpene analysis is conducted where THC, THCA, and CBD testing are mandated as well. This is typically done with a GC-FID or GC-MS unit. Although there are no regulatory limits associated with terpene data, it will be analyzed and collected by EC Developments.

(a) EC Developments' Internal Testing Regime Exceeds Requirements

EC Developments' CQCTP also provides that the QAM may undertake random testing of cannabis and cannabis products as an additional measure to optimize quality cultivation. The QAM will establish EC Developments' testing requirements and sample size required for in-process and finished products. No less than 2% of each batch will undergo testing. The QAM will perform the following assessments with the appropriate frequency needed to achieve the specific testing objective.

- Potency and terpene analysis before extraction and contaminant testing if contamination is suspect
- Potency and terpene testing to determine proper run times for strains of cultivated, extracted cannabis
- Potency and terpene monitoring to ensure full decarboxylation
- Testing for identity, potency, contaminants, residuals and metals before formulation\*(\*However, only independently validated laboratory test reports will be used for product labeling)
- Full suite of testing before release

(i) Lab Instrumentation

Multiple instruments will be utilized in the internal laboratory; each instrument provides for a published or validated method for the type of analysis being performed including:

- UPLC/HPLC (Testing services to separate, characterize, identify, and quantitate semi- and nonvolatile materials in various samples)
- UPLC/MS/MS (An analytical chemistry technique that combines the physical separation capabilities of liquid chromatography with the mass analysis capabilities of mass spectrometry.)
- GC/MS (An analytical method that combines the features of gas-chromatography and mass spectrometry to identify different substances within a test sample.)
- GC/FID (A scientific instrument that measures analytes in a gas stream. It is frequently used as a detector in gas chromatography.)
- IPC/MS (a type of mass spectrometry that uses an inductively coupled plasma to ionize the sample. It atomizes the sample and creates atomic and small polyatomic ions, which are then detected)
- MDE and qPCR (A well-established method for the detection, quantification, and typing of different microbial agents in the areas of clinical and veterinary diagnostics and food safety.)

Equipment and instrumentation used for the analysis of test samples will be adequately inspected, cleaned and maintained. Equipment or instrumentation used for the generation or measurement of data will be adequately tested and calibrated on a regular schedule. Records will

be maintained for all inspection, maintenance, testing and calibrating operations. These records will include the date of the operation, the person who performed it, the written procedure used and any deviations from the written procedure. Records will also be kept for non-routine repairs performed on equipment as a result of failure and malfunction. Such records will document the nature of the repair, how and when the need for the repair was discovered and any remedial action taken in response to the repair.

(ii) Chemicals and Standards

All analytical reagents, solutions, and reference standards will be handled in accordance with regulations. They will be labeled appropriately and stored under appropriate conditions to minimize degradation or deterioration of the material to ensure accurate test results and to ensure the safety of products, customers, and employees. The QAM will acquire commercial reference standards for cannabinoids when they are available. Otherwise, the lab will internally produce reference standards, since some of the rare cannabinoids are not commercially available as analytical grade standards. If internally produced, the laboratory will utilize appropriate analytical techniques to document the purity and concentration of the internally-produced reference standards. The lab will obtain or, for internally produced standards, create and maintain a certificate of analysis (COA) for each lot of reference standards.

(iii) Component Testing

EC Developments has developed and adopted procedures for the testing of components that conform to best practice for the cannabis and pharmaceutical sectors. Testing will be performed on components used for the cultivation of the final cannabis product including, but not limited to, water or growing materials. Testing may also be performed on the final cannabis extract before packaging, *e.g.* for cannabinoid profile verification or contaminant testing. Strict controls will be implemented to validate and document all procedures including the testing of components. Components requiring testing include soil, water, gasses, chemicals, nutrients, and packaging. EC Developments' QAM will possess testing capabilities for chemical and microbiological analysis. The laboratory will not provide required component testing unless it has validated a published method for the test to be performed. The QAM will validate any internal standards and will establish component-testing protocols. Component validation is required throughout EC Developments' cultivation processes. The cultivation process requires certification or testing for CO<sub>2</sub>, excipients, capsules, vaporizer cartridges, packaging, and labeling.

An adequately trained cultivation employee may test components including water and soil utilizing pH, EC, ORP, TDS, temperature or other basic meters. Visual inspection of cultivation accessories (capsules, cartridges, etc.) and packaging and labeling components is required to ensure quality control over final products. The results of all component testing must be recorded in the appropriate logs or information management system.

(iv) Product Consistency

EC Developments has adopted pharmaceutical standards for potency variance and to ensure measurable concentration of total THC, or total CBD, to be indicated on the label for the product. Testing of all products in accordance with internal testing policies and procedures will validate all formulations. Additionally, independent lab testing of all products for distribution will be performed. No less than 2% of any cultivated batch will be analyzed. No cannabis product, including cannabis, 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: Adult Use of Marijuana. Representative samples will be collected and maintained by EC Developments in accordance with regulations and EC Developments policy on retesting. EC Developments will maintain all appropriate records.

(v) Product Stability

EC Developments will demonstrate the stability of each product produced by performing stability testing that will determine the stability and expiration date of the final distributed cannabis product. The expiration date will be validated and stable for a minimum of 60 days under the specified storage conditions (light, temperature, and humidity) when opened. Next, EC Developments will identify the shelf life and expiration date of unopened cannabis products (e.g., packages or vials). Shelf-life determinations will be validated by ongoing stability testing according to a schedule determined by EC Developments and specify storage conditions once the package is sealed, during transport, at the dispensing facility, in the customer's home and for samples retained for future testing.

EC Developments will routinely evaluate the stability of its cannabinoid concentrates and each cannabis product produced with validation by testing at an approved laboratory. EC Developments will oversee ongoing stability testing according to a determined schedule. The COO will ensure the laboratory determined expiration date and specifications regarding storage conditions address storage at the cultivation facility once the package is sealed, during transport, at the retail facility, in the customer's home and for samples retained for future testing are properly applied in EC Developments' SOPs, in packaging, labeling and transport operations. EC Developments will ensure all products distributed in multiple dose re-sealable containers are stable for a minimum of sixty days after being opened as specified in the label directions and storage conditions of light, temperature, and humidity. EC Developments will comply with all laboratory-established stability testing plans and protocols.

The stability testing plan will consist of accelerated stability at 104°F 75% Relative Humidity (RH) for up to six months and long-term room temperature stability at 77°F 60% RH for 3, 6, 9, 15 months and yearly thereafter. Based upon the product or cannabinoid concentrate characteristics alternate storage conditions, ICH (International Conference on Harmonization) guidelines may be utilized. Stability testing requirements will be defined in a written protocol

and will include sample size and test intervals based on statistical criteria for each attribute examined to assure valid product stability and expiration dating, storage conditions for samples retained for testing, reliable, meaningful and specific test methods and product testing in the same container-closure system as the product is distributed. An adequate number of batches of each product brand, dosage form, and packaging format will be tested to determine an appropriate expiration date.

Accelerated studies, combined with basic stability information on the product composition and container-closure system, may be used to support tentative expiration dates, provided that full shelf life studies are not available and are being conducted. Where data from accelerated studies are used to project a tentative expiration date that is beyond a date supported by actual shelf life studies, long-term room temperature testing at appropriate intervals will be performed until the tentative expiration date is verified or a more appropriate expiration date is determined. Accelerated stability samples will be in the same packaging material as the final distributed product. If a product is not stable under accelerated conditions, but is stable under room temperature conditions, then the room temperature stability data will be utilized to establish the product's expiration dating.

(vi) Analysis and Corrective Action

All stability results will be promptly evaluated upon completion of each testing interval. Results will be tabulated as part of the evaluation and reviewed for adverse trends. All stability failures will be promptly investigated. EC Developments, with oversight by the COO, will review the finalized written investigation, including any necessary corrective actions that were taken. Appropriate stability studies may be dropped from the stability program based upon the deletion of products from the production mix, revisions in product formulations, revisions in product packaging or other justifiable reasons as determined by EC Developments.

(b) Accurate Final Test Reports and Certificates of Analysis

EC Developments' third-party testing laboratory will file with the Commission an electronic copy of each laboratory test result for any batch that does not pass the microbiological, mycotoxin, heavy metals, or pesticide chemical residue test, at the same time that it transmits those results to EC Developments. In addition, the laboratory will maintain the laboratory test results for at least five years and make them available at the Commission's request.

EC Developments will maintain these laboratory test reports in hard copy and electronically, for each batch of cannabis product produced, if sampled, and will make these analytical tests available upon request to customers and the Commission in the form of a COA.

(c) Inventory Tracking Measures Ensure Cannabis and Cannabis Products Remain Safe and Contaminant-Free

From the outset, a rigorous chain of custody will be maintained to ensure that cannabis products are not released for dispensing to customers until they are properly tested for contaminants and potency. In this same vein, every cannabis product produced or sampled at EC Developments' facility will be tracked according to a chain of custody SOP, which requires every employee involved in processing, transferring, testing, and storing to be identified in a chain of custody log. Likewise, from the time a batch has been processed until the independent testing laboratory provides a report detailing passing results, the QAM will segregate and withhold from use the entire batch, except the samples that have been removed for testing.

EC Developments will use a S2S to track and trace all cannabis products and inventory, including wholesale, from seed to sale, including lab samples. During every phase of cultivation, as well as during recalls, EC Developments will track by weight and via barcode, all unusable cannabis, such as outdated, damaged, deteriorated, mislabeled, contaminated, or waste before disposal. The COO will ensure the S2S is accurate and capable of producing, upon request, reports on all cannabis stored including waste inventory which will be recorded in the Waste Disposal Log and S2S accordingly. EC Developments will comply with all regulations regarding the disposal of extracted cannabis products. Electronic documentation of destruction and /or disposal will be maintained in perpetuity.

In alignment with its values of compliance and transparency, EC Developments leadership team has performed significant due diligence in choosing its cannabis traceability system. Through the research and representative interviews of the leading platforms offering S2S and point-of-sale (POS) systems, coupled with the real world experience of its leadership team in operating cannabis businesses throughout the country, EC Developments has chosen an effective and compliant system.

## **RECORDKEEPING PROCEDURES**

EC Developments will maintain records that conform to Cannabis Control Commission (the Commission) regulations and best practices for the industry to ensure accurate recordkeeping. EC Developments' recordkeeping policies and procedures demonstrate not only compliance with legal and regulatory requirements, but a commitment to full documentation and transparency of all operations. EC Developments will maintain strict control over records to provide accurate and timely operating data to management, document operations for third-party certifiers or auditors, and records of operations in case of any insurance claims, or legal or administrative investigation(s).

EC Developments will maintain documentation in a secure, locked location for at least three (3) years from the date of the documents' production. Reports will be issued for security alarm system failures stemming from a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours. Reports will also be issued for discrepancies identified during inventory suggestive of diversion, theft, loss, and/or any criminal action involving the Commission or an agent. Reports will also be issued for any unauthorized destruction of cannabis, any loss or unauthorized alteration of records, or other breach of security.

EC Developments will operate with full transparency for all stakeholders, including agents, regulators, qualified dispensaries, law enforcement, and local officials. The company will maintain true, complete, and current records available for inspection by the Commission or other authorized authorities upon request. Exceeding the requirements set forth by the Commission, records will include those related to written operating procedures, inventory records, seed-to-sale (S2S) electronic tracking system records (*see* 935 CMR 500.105(8)(c),(d)), policies, procedures, security records, audit records, staff training plans and completion documentation, staffing plan, and business records. In addition, personnel records will also be available for inspection by the Commission, including the following:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. Corporate records, including the following:
  - a. Insurance coverage policies and related documentation;
  - b. Contracts with all ancillary businesses, including equipment companies, third-party laboratories, packaging companies, etc.
  - c. Commission documentation, including Annual Agent Registrations and Marijuana Establishment Registration;
  - d. Local permitting and documentation, such as Special Use Permits, Certificate of Occupancy, documentation related to any variances obtained, preliminary and architectural drawings and site plan approvals.

- e. Corporate filing documentation, annual renewals, bylaws and/or operating agreements, and annual reports.
- 3. A personnel record for each EC Developments agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the cannabis establishment and shall include, at a minimum, the following:
  - a. All materials submitted to the Commission;
  - b. Documentation of verification of references;
  - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - d. 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;
  - e. Documentation of periodic performance evaluations;
  - f. A record of any disciplinary action taken; and
  - g. Notice of completed Responsible Vendor Training Program and in-house training for EC Developments agents.
- 3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- 4. Personnel policies and procedures, including, at a minimum, the following:
  - a. Code of ethics;
  - b. Whistle-blower policy; and
  - c. A policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights>, including provisions prohibiting discrimination and providing reasonable accommodations; and
  - d. All background check reports obtained in accordance with Commission regulations and Criminal Offender Record Information (CORI).

Similarly, management will be trained to keep and maintain records that clearly reflect all financial transactions and the financial condition of the business. These records will be kept and maintained on the licensed premises for a five-year period and will be made available for inspection as requested by the Commission, and, when applicable, Massachusetts's Department of Revenue. These records include manual or computerized records of:

- 1. Assets and liabilities;
- 2. Monetary transactions;
- 3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- 4. Sales records, including the quantity, form, and cost of cannabis products;



5. Salary and wages paid to each employee, stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the cannabis establishment;
6. Purchase invoices, bills of lading, manifests, sales records, copies of bills of sale and any supporting documents, including the items and/or services purchased, from whom the items were purchased, and the date of purchase;
7. Bank statements and canceled checks for all accounts relating to EC Developments;
8. Accounting and tax records related to EC Developments;
9. Records of all financial transactions related to the production facility, including contracts and/or agreements for services performed or received that relate to EC Developments;
10. All employee records, including training, education, discipline, etc.;
11. Production records, including:
  - a. Planting, harvest and curing, weighing, destruction of cannabis, creating batches of cannabis-infused products, and packaging and labeling;
  - b. Disposal of cannabis and waste materials associated with production;
    - i. A written record of the date, the type and quantity disposed of or handled,
    - ii. the manner of disposal or other handling,
    - iii. the location of disposal or other handling,
    - iv. the names of the two agents present during the disposal or handling, with their signatures.
    - v. These records will be kept for an extended period of time if any enforcement action is taken.
12. Records of each batch of extracts or cannabis-infused products made, including, at a minimum, the usable cannabis or trim, leaves, and other plant matter (including the total weight of the base product), any solvents or other compounds utilized, and the product type and the total weight of the end product produced (i.e., hash oil, shatter, tincture, infused dairy butter);
13. Transportation records;
14. Inventory records, including plants, seeds, clones, all phases of cultivation, drying, curing, harvesting; any damaged, defective, expired, or contaminated cannabis; including the date of inventory, a summary of the inventory findings, names, signatures, and titles of individuals conducting the inventory.
15. Records of all samples sent to an independent testing lab and/or the Commission's lab and the quality assurance test results;
16. All samples provided to anyone or any entity for any purpose; and
17. Any records of theft, loss or other unaccountability of any cannabis seedlings, clones, plants, trim or other plant material, extracts, cannabis-infused products, or other items containing cannabis.

Within ten (10) calendar days, EC Developments will provide the Commission with written notice of any incident described in 935 CMR 500.110(7)(a). This notice will include a detailed

incident report with the investigation, findings, resolution (if any), and confirmation that law enforcement and the Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by EC Developments 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 upon request.

The Chief Operating Officer (COO) will ensure these records are accurate and securely maintained and properly preserved. Should the cultivation facility close, all records will be preserved for at least 3 years, or longer if requested by the Commission, in a form and location that is acceptable to the Commission, at the expense of EC Developments.

A visitor sign-in and sign-out record will be maintained at the security office. The record 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.

EC Developments will keep true, complete, legible, and current books and records of the following:

1. The amount of cannabis transported to another facility;
2. The date of each sale or distribution to a registered cannabis organization;
3. The name, address and registration number of the cannabis organization;
4. The item number, product name (description), and quantity of cannabis registered by the Commission and sold or otherwise distributed to the cannabis organization;
5. The price charged and the amount received for the cannabis from the cannabis organization;
6. The reason for the distribution, if the distribution was for a purpose other than sale; and
7. The quantity and form of cannabis maintained at the facility on a daily basis.

## **MAINTAINING OF FINANCIAL RECORDS**

EC Developments places in high priority the maintenance of financial records, maintaining all financial records in accordance with generally accepted accounting principles, as discussed below. As such, it will abide by the following standard operating procedures (SOPs) for the handling of cash on the premises, including but not limited to storage, collection frequency, and transport to financial institution(s).

EC Developments will remain in compliance with Commission regulations including those relating to maintenance of financial records. Through the experience of its leadership team in ensuring ongoing compliance in recordkeeping, EC Developments is confident in its ability to develop and maintain SOPs that result in up-to-date, accurate, and compliant financial records.

### **1. Overview**

EC Developments will keep financial records in accordance with generally accepted accounting principles (GAAP). These financial records will include ongoing documentation of assets and liabilities; all monetary transactions; books of accounts such as journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers; and salaries and wages paid to all employees, stipends paid to each board member and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with EC Developments.

EC Developments will implement SOPs designed to protect important and confidential records while ensuring that EC Developments is in full compliance with Commission regulations, generally accepted accounting principles, and all other applicable laws, regulations, and local rules. EC Developments's financial records maintenance is designed so that all employees know their role in recording and maintaining records.

EC Developments' SOPs governing the maintenance of financial records will ensure that records are organized, to facilitate proper and timely retrieval of records, and to document program compliance. EC Developments' management and leadership team will be responsible for managing compliant physical and digital records, conducting record reviews and audits, updating the record keeping SOPs, and fulfilling record requests by the Commission and law enforcement. The result will be a robust, transparent set of records for EC Developments' facility.

### **2. Types of Financial Documentation**

EC Developments will maintaining, at minimum, the following list of business records, in accordance with 935.CMR.500.105(9)(e), which shall include manual or computerized records:

- 1. Assets and liabilities;
- 2. Monetary transactions;

- 3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- 4. Sales records, including the quantity, form, and cost of marijuana products; and
- 5. 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 the marijuana establishment.
- 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 500.550 or any other section of the Commission's regulations.

Other financial records subject to retention include paper and digital business records: assets and liabilities; monetary transactions; books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the company.

### 3. Renewal Documentation

In compliance with Commission regulations, EC Developments will make available an accounting of the financial benefits accruing to its municipality, Greenfield, as the result of its host community agreement with the City. EC Developments will engage in an ongoing mutually beneficial relationship with the City and will work with the City to ensure its cost-benefit information is regularly updated.

### 4. Financial Record Preservation

EC Developments will retain records from separate accounting practices at the point-of-sale for cannabis and cannabis product sales. The records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the Commissioner consents in writing to an earlier destruction, the records must be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired; generally, this is three years after the due date of the return or the date the return is actually filed, whichever occurs later.

In excess of minimum retention schedules, EC Developments will retain a digital copy of all records subject to retention and inspection indefinitely. Paper records will also be digitized and stored indefinitely. All records will be furnished to the Commission or duly authorized party such as law enforcement immediately upon request.

## 5. Financial Record Format and Storage

EC Developments's records will be kept in paper and digital formats in accordance with the Company's SOPs. Upon receipt of a license, EC Developments will begin implementing METRC as the Company's inventory tracking system (ITS). EC Developments's point of sale (POS) system will be fully integrated with METRC to ensure transparency and efficiency in all records handling.

All physical records will be securely stored in a locked, fireproof filing cabinet in the restricted Security Office. Vendor-specific documents will be stored and categorized by vendor and date of record creation. Production batch records, sales receipts, shipping manifests, inventory audit reports, quarantine records, waste and destruction records, and other internal documents and files will be stored chronologically and by document type.

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.

Physical records may be scanned and stored as duplicate electronic files. The employee responsible for scanning the document, will also log the information indicating that the document has been duplicated and stored electronically. All hard copy records will be kept for no less than one (1) year, unless mandated otherwise by the Commission or State government, or stated herein.

As part of its record keeping protocol, EC Developments will utilize its POS system, and accounting software, as well as an encrypted storage drive to upload and maintain digital records on the Company computer system. All digital records will be stored and maintained in such a way as to guarantee confidentiality, access to the Commission for audits, protections against unauthorized changes to data, and an audit trail to monitor all modifications to records. To safeguard digital records, EC Developments will institute Internet Protocol (IP) Security. All company computers will be protected with antivirus/malware software and daily IP scans will be conducted. Digital records will be encrypted, and only accessible by the RT. All employees involved in the record keeping process will receive training for the Compliance Manager on proper record keeping procedures, including compliance and confidentiality. All digital records will be kept for no less than one (1) year, unless mandated otherwise by the Massachusetts Cannabis Control Commission (Commission) or state agency or otherwise as listed below.

## 6. Record Requests

Records will promptly be made available to the Commission and law enforcement upon request. EC Developments' Chief Financial Officer (CFO) will locate and release the information to the Commission as soon as possible but no later than the end of the business day, unless the Commission grants more time to complete the request. Other parties who request or require records will receive a timely response from EC Developments within one business day or in accordance with other mandates. SOP's will require that every record request is documented and retained in the Security Office along with a copy of any records that were released. If electronic recordings, physical or digital copies of documents, or products are released to the Commission or law enforcement, the items will be prepared to remain compliant with chain of custody SOPs.

## 7. Record Destruction

Records will not be intentionally damaged, altered, disposed of, or removed except with authorization from the RT in accordance with record retention and destruction SOPs or as otherwise directed by the Commission. This includes both hard-copy, physical records and electronic, digital records, as well as sales records stored on software. In the event it is discovered that there is any manipulation or alteration of records, EC Developments will immediately disclose the situation to the Commission and will comply with any investigation and resulting action plans, up to and including termination of the individual responsible and notification to law enforcement. EC Developments will keep all incident report documentation as stated below in "Operational Records."

The Director of Compliance is responsible for identifying which, if any, records must be destroyed and for overseeing their destruction. Duplicate physical documents printed for use in operations, documents with incorrect information, and other unnecessary documents are all examples of documents that can and should be destroyed in order to limit the amount of paper records in storage to pertinent documentation. Destruction of all physical records and other business documents will be accomplished by cross-shredding. Any documents to be shredded will first be scanned and uploaded as encrypted, electronic files in a file titled "Destroyed" to ensure that there is a full and complete record of all business and operational information held by EC Developments at all times.

In the event licensed business should close operations, EC Developments will maintain records at EC Developments's expense for at least two (2) years in a form and location acceptable to the Commission at the expense of EC Developments, per Commission regulations. EC Developments will identify and provide telephone, address, and electronic contact information for a primary and secondary person to facilitate future record reviews in accordance with the approved closing plan.

## 8. Audits and Training

In accordance with its mission of transparency, EC Developments will train all staff to understand how financial recordkeeping is applied throughout daily operations. Agents will be trained on the above financial requirements, including regulations applicable to medical-use and adult-use.

To ensure compliance with EC Developments SOPs, EC Developments will conduct, at minimum, monthly audits of software, platforms, equipment, and data to ensure no additional software or other methods have been used to alter or manipulate sales data. The record of monthly review will be retained and made available to the Commission upon request.

EC Developments' cultivation facility will only utilize a inventory system approved by the Commission, in consultation with the DOR. It will never utilize software or other methods to manipulate or alter sales data and will immediately terminate and report any individual found doing so, or attempting to do so.

EC Developments will conduct, at minimum, a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. It will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. Should EC Developments find 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, it will immediately disclose the information to the Commission, will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data, and will take such other action directed by the Commission.

EC Developments welcomes the Commission and the DOR to audit and examine its POS system in order to ensure compliance with Massachusetts tax laws and Commission regulations. EC Developments will maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products.

## ENERGY COMPLIANCE PLAN

### 1. EC Developments' Ethos of Community Stewardship Extends to the Environment by Integrating Energy-Efficient and Environmentally Conscious Best Practices

#### (a) Overview of Environmental Stewardship Plan

EC Developments is eager to contribute to the ongoing efforts of Massachusetts' citizens and community leaders to revitalize the economy and contribute to the local community. This ethos of community stewardship extends to EC Developments' environmental and energy plans. As a responsible member of the community, EC Developments is committed to fostering relationships with neighboring businesses and residents, as well as with local law enforcement. Beyond its secure facility outfitting to instill trust and ensure safety, EC Developments has also designed a thoughtful environmental plan that conserves natural resources, mitigates odor, reduces energy consumption, and protects the environment.

Few factors are more vital for high-quality cannabis production than environmental protection, energy efficiency, odor mitigation, and climate control. Growers face ongoing challenges in producing cannabis without mold, while meeting regulatory initiatives to reduce energy consumption. Inadequately selected HVAC systems and poor air distribution are some of the leading causes of molds and other pathogens in cannabis cultivation and production. However, monitoring lighting levels during flowering stages and humidity levels during the late flower cycle is extremely energy demanding. Ignoring the realities of cultivation-and production-inducing odors and contaminants causes the deterioration of neighboring properties and, rightfully, disgruntled neighbors.

Mindful of the vital importance of continuous climate control, EC Developments has prioritized its acquisition of energy-efficient certified HVAC and lighting systems, environmentally friendly air purification and odor mitigation systems, humidity controls, CO<sub>2</sub> regulation systems, and plumbing systems. Mold-free, nutrient-rich cannabis and energy-efficient practices do not have to be mutually exclusive. EC Developments' climate control system solves for all these issues while providing optimal and sustainable production conditions.

EC Developments believes in the importance of minimizing its carbon footprint, environmental impact, and resource needs for its facility, and will abide by Franklin County and Greenfield ordinances regarding environmental issues. As a team consisting of many local employees, EC Developments has a vested interest in instilling environmentally friendly practices to protect its community and surroundings. This includes applying environmentally friendly initiatives with regard to resource consumption, including electricity, water, and gas. Additionally, EC Developments will adhere to green policies that reduce environmental toxins and noxious odors.



EC Developments will continuously implement best practices that reduce overall negative environmental impact. These include the use of controls, sensors, and timers to reduce energy consumption, including lighting and temperature controls at its facility. Additionally, EC Developments seeks to have superior air quality within its facility with the use of an up-to-date air purification system in order to protect its employees, visitors, and cannabis plants or products from exposure to any airborne contaminants or noxious odors. EC Developments seeks to become a leader in sustainable practices within the State, demonstrating a safe and effective means to reduce overall carbon footprint.

By reducing resource needs, EC Developments will improve overall efficiency within the facility while also reducing its negative impact on the environment. As a result, the company will facilitate in lowering greenhouse gas emissions, reduce the impact on climate change, and protect the surrounding environment. EC Developments plans to employ local vendors, contractors, and suppliers who supersede minimum environmental regulations and employ environmentally friendly practices. Additionally, EC Developments seeks to achieve the globally recognized Leadership in Energy and Environmental Design (LEED) certification. All of these methods have been successfully deployed by EC Developments' leadership teams, resulting in their compatibility with neighboring properties and the surrounding community. Specifically, EC Developments will minimize its impact on the surrounding environment and limit resource demands by taking the following initial steps with respect to its facility design.

(b) Facility Envelope Intake and Exhaust Fans With Activated Charcoal Filters to Purify Air and Mitigate Odor

To maintain superior air quality and mitigate odor facility-wide, EC Developments will install exhaust fans leading out of the overall facility envelope with an activated charcoal filter that will serve to combat odors and contaminants. To further ensure the highest quality of environmental air and address energy sustainability issues, EC Developments will employ the use of evaporative coolers to be used as inlet fans with High Efficiency Particulate Air (HEPA) filters into the facility's overall envelope. Providing cooled, filtered air into the facility will also mean less chance of contaminants being introduced into the clean rooms. This also provides a more cost-effective alternative to operating an HVAC system to cool the overall interior of the facility.

Another sustainable energy option is to add transparent panels along the upper portion of the facility walls to lessen the power load needed to light the inside of the facility. To further ensure the highest quality of environmental air both internally and externally, EC Developments will explore options for incorporating a negative air machine with an air-scrubbing technology, which will be particularly helpful with areas of operational activities that produce greater levels of air contaminants.

(c) Energy Consumption and Temperature Regulation With Systems that Remove Excess Moisture, Odors, and Contaminants

Additionally, EC Developments intends to exceed the U.S. Department of Energy's recommendations for temperature regulating. This includes regulation-standard insulation for temperature control and minimization of heating/cooling needs. Likewise, for the benefit of EC Developments' cultivation employees, as well as the cannabis plants, the HVAC system installed inside each of the cultivation areas will be outfitted with a UV and HEPA filtration system.

EC Developments will also have ultra-efficient air conditioning and heating units installed by an HVAC specialist to minimize energy consumption and maximize heating/cooling efficiency. This system will provide indoor air quality, removing excess moisture; odors; smoke; and airborne contaminants, including dust, bacteria, and unwanted gases. This is essential for the health of all employees and visitors, as well as for the protection of EC Developments' marijuana products. Additionally, this system is designed to work as efficiently as possible, reducing excess energy consumption and with minimal waste. The facility will also employ a zone control system in order to heat and cool areas specific to its needs. The combined efforts of these practices will reduce energy output significantly. All HVAC systems will comply with the Massachusetts Building Codes. EC Developments will obtain a Massachusetts licensed mechanical engineer to certify that the HVAC and dehumidification equipment complies with the state building codes.

The Greenfield area is known for its unique mix of industry and beautiful landscapes. EC Developments will honor the natural areas near its facility location by strictly adhering to green policies and environmentally friendly initiatives. This includes issues pertaining to electricity, water, and gas usage, in addition to noxious odors, toxins in the environment, and all other such negative environmental impacts. As a team composed of proud Massachusetts residents, EC Developments is personally vested in ensuring environmental policies are implemented to the fullest extent.

In this spirit, EC Developments will participate in clean energy programs, pursuant to M.G.L. c. 25, § 21, to reinvest in renewable energy and help protect the environment. As options to reduce environmental impact become more accessible and economically feasible, the company will continue to evolve day-to-day practices and adopt new technologies. EC Developments will also collaborate with city and Franklin County officials, industry experts, and Green Globes professionals to enhance its facility and achieve green certification.

(d) Energy-Efficient Facility Design

EC Developments' facility will comply with the Massachusetts Building Code requirements (780 CMR), the national model standard for energy-efficient construction recognized by federal law and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)

Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*. As such, EC Developments' interior design and layout will reduce the amount of energy used to regulate temperatures facility-wide, thereby significantly reducing adverse environmental impact. Through its streamlined floor plan, sequenced in order of cultivation stages through production, EC Developments will streamline production while maintaining systemic energy-efficient policies. Segregating individual rooms for cultivation and processing also serves to mitigate cross-contamination, foster healthy harvests, and create the opportunity to sanitize rooms during transitions. To further reduce the need for harsh chemical cleaning supplies, antimicrobial building materials will be used in sanitary areas; this also mitigates groundwater contamination. Likewise, steam cleaning technology will be used for sanitization, as a sustainable alternative to chemical cleaners.

EC Developments will designate a segregated quarantine room to intercept and mitigate the spread of any pests and diseases. Such a facility layout, mindful of the cyclical cultivation processes, creates a controlled environment in which organic and otherwise less toxic plant treatments will succeed in treating early-stage issues. The quarantine room eliminates the need to use toxic synthetics, which are commonly applied to mitigate larger issues occurring in an open-plan cultivation operation layout.

#### (e) LEED-Badge Certified Vendors

With locally based leadership, EC Developments is well-positioned and committed to environmentally conscious and sustainable design. EC Developments will minimize the environmental impact of its operations by selectively choosing locally available materials and local vendors, and implementing environmentally conscious practices throughout facility operations. EC Developments intends to hire from local, diverse vendors, including its contractors and suppliers, and will specifically seek out vendors who are LEED-accredited engineers, architects, and construction professionals. Part of the vetting process for these vendors includes ensuring their use of best environmental practices and sustainable materials.

#### (f) Curated Equipment and Supplies to Minimize Energy Use

As further described below, EC Developments will curate equipment and supplies that minimize electricity usage.

### 2. Lighting Cycles and Ballots to Reduce Electricity Use

To reduce electricity demand during the day, EC Developments will schedule indoor lighting cycles during the night, thus eliminating excess energy usage for heating during the night hours and air conditioning during the day. This will serve to significantly reduce the adverse climate effect. EC Developments will also implement electronic ballasts for all lighting sources requiring a ballast, as electronic ballasts reduce electricity, heat, and air conditioning usage while increasing light output. When installing new electrical equipment, EC Developments will also use products certified with the Energy Star® seal, whenever feasible.

### 3. Energy-Efficient HVAC Systems

EC Developments will commit to only high-efficiency ductless split HVAC units and variable refrigerant flow HVAC units, or other more energy-efficient equipment.

At EC Developments' new facility, all rooms will be equipped with heating, ventilation, and air conditioning (HVAC) systems to maintain ideal environmental conditions for production. Each HVAC system is equipped with HEPA filters, UV light, activated carbon (charcoal filters), a dehumidifier, humidifier, automated temperature controller, and carbon dioxide (CO<sub>2</sub>) generator. Specifically, the 24ANB7 Infinity 17 2-Stage Air Conditioner with Puron refrigerant is one of the industry's energy-efficient systems, with up to 17.0 Seasonal Energy Efficiency Ratio (SEER) and a sound level that can reach as low as 67 decibels (dBA).

This system has been designed and manufactured to meet Energy Star<sup>®</sup> Criteria for energy efficiency when matched with the coil component EC Developments has outlined below. It is also an ISO 9001 Certified System, constructed in an ISO 9001 approved facility. As a company guarantee, the system will be rated in accordance with the latest edition of Air Conditioning, Heating, and Refrigeration Institute (AHRI) Standard 210; will be certified for capacity and efficiency, and listed in the latest AHRI directory; will comply with the latest edition of American National Standards Institute/American Society of Heating, Refrigerating and Air-Conditioning Engineers (ANSI/ASHRAE) and with National Electric Code (NEC); will be constructed in accordance with UL standards, and will carry the UL label of approval; the unit's cabinet will be capable of withstanding Federal Test Method Standard No. 141 (Method 6061), 500-hr salt spray test; and the air-cooled condenser coils will be leak and pressure tested.

As more fully discussed below, this is important because plants need CO<sub>2</sub>, in addition to water and nutrients, for optimal growth. CO<sub>2</sub> sensors will also be installed in the grow rooms and have a set point (i.e., 900 ppm). As soon as the concentration of CO<sub>2</sub> falls below the set point in the air, the CO<sub>2</sub> is released from the generator until the set required level of CO<sub>2</sub> in the air is achieved. HEPA filters will remove microorganisms from the air, thereby mitigating the risk of cross-contamination. UV light will also significantly reduce microorganisms in the air, thus minimizing cross-contamination. Through temperature sensors in each HVAC system, the required temperature for each room can be separately maintained. If the temperature deviates from the set point (i.e., 21°C), the HVAC system will generate heating or cooling as required to maintain the desired set point.

In addition to EC Developments' ducted system, it will also utilize the Carrier 38/40GRQ series ductless split system. Uniquely, EC Developments' HVAC system will balance energy efficiency, quality-controlled environments, and cost efficiency. The fan coils of the systems will be mounted to the wall near the ceiling to provide maximum air circulation without overtaking floor

space or obstructing windows. As an added measure of security, the units are connected by refrigerant piping and wiring, rather than ductwork, thus eliminating the risk of intruders entering through any ducts. In alignment with EC Developments' focus on environmentally friendly processes, this system allows individual rooms to be heated and cooled, rather than the entire facility at once. Because air is moved only into the space required, no energy is wasted in moving the air through ducts.

Further bolstering the energy efficiency of EC Developments' facility, EC Developments will also utilize the Carrier Premium Environmentally Sound Fan Coil with its HVAC systems, or similar brand. The FV4C is the premium air handler combining the proven technology of Carrier fan coils with environmentally sound Puron<sup>®</sup> refrigerant. This chlorine-free refrigerant is beneficial to the industry-leading system, as it provides 30-40% greater efficiency than standard heating and cooling systems. In addition to the outstanding efficiency of this model, the FV4C was designed with grooved tubing, louvered aluminum fins, and large face coils to provide superior efficiency in its performance. As an added safety measure, all system components are enveloped within a leak-free, thick, high-density insulation within a metal cabinet. EC Developments will utilize only the most superior in its technology and equipment, starting with its Carrier brand HVAC and sound fan coil systems.

To provide optimum environmental conditions for each growth stage throughout the plant's life cycle, humidity levels must be controlled. The role of the above HVAC unit and Sound Fan Coil Systems is to provide this control over each room's temperature and humidity setpoints while maintaining maximum efficiency and lower energy usage. Vapor pressure deficit (VPD) is another aspect of temperature and humidity control that affects the health of the cannabis plant. In fact, peer-reviewed scientific literature indicates that VPD is a better parameter for the growth of plants than only temperature and humidity. VPD in cannabis refers to the difference between the vapor pressure outside the plant than within the plant. Sufficient transpiration, when nutrients flow throughout the cells of the plant, can only occur when optimal VPD is achieved. Therefore, EC Developments will utilize an American-made ICM380 Pressure Transducer.

The transducer will facilitate in the monitoring of discharge and suction pressure, subcooling and superheat calculations, compressor oil pressure, condenser fan control, compressor staging and unloading, and remote systems diagnostics. The ICM380 provides long-term reliability over the facility's HVAC and refrigeration systems, and will ensure that EC Developments' cultivation and extraction teams are operating in the best possible environment for cannabis growth and health. As reflected above, EC Developments has sought to procure the best types of equipment that provide energy efficiency. EC Developments will continue its due diligence process in ensuring it procures equipment brands that meet its standards of energy efficiency and cost-effectiveness. Although these brands reflect EC Developments' model of environmental consciousness and quality production, should EC Developments find brands that provide greater

efficiency and result in better quality products for Massachusetts customers, EC Developments will then utilize those brands.

#### 4. Energy-Efficient LED Grow Lighting

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EC Developments will use adjustable spectrum light emitting diode (LED) lamps as the primary source of lighting in vegetative, mother, and propagation spaces, and as supplementary lighting in flowering spaces. The active growing space will never exceed 36 watts per gross square foot. LED lamps use only six to nine watts and can reduce electricity usage up to 70% compared to the traditional high-pressure sodium (HPS) or metal-halide (MH) lamps. The low voltage of LED lamps reduces the risk of accidental fires or electric shocks if exposed to moisture. In addition, LED lamps do not experience degradation and rarely need replacing, as opposed to HPS and MH lamps, which require replacement every three to four cultivation cycles. LED lamps are easy and safe to replace because they do not contain vapors, mercury, or glass. LEDs also eliminate the need for replacement of HPS hood assemblies prone to interior reflector degradation, traditionally requiring replacement every two to three years. Additionally, LEDs generate less heat than traditional HPS or MH lamps, requiring reduced cooling efforts.

##### (a) Further Steps to Minimize Carbon Footprint and Environmental Impact

EC Developments will continue to adopt new technologies to reduce the environmental impact and electric demand (such as lighting schedules, active load management, and energy storage), while becoming more economically sustainable. This includes the use of paper and cardboard, and implementing recycling methods. The facility is expected to produce average levels of plastic, glass, and aluminum waste. EC Developments will properly utilize refuse containers for all combustible trash, including paper, pasteboard boxes, glass, and all other trash or discarded materials not containing plant matter. Similarly, EC Developments will properly utilize well-labelled refuse containers for designated recyclable materials, separate from solid waste containers. EC Developments will provide recycling bins for assorted plastics, glass, aluminum, and paper products in all facilities. For ease-of-use by its employees, EC Developments will utilize color-coded cans specifically outlining where to dispose of a particular product. Specifying between landfill waste, paper waste, cans, and plastics will allow a great amount of refuse to be properly disposed of and recycled.



### *Image of easily recognizable color-coded disposal containers*

EC Developments will engage with local waste management authorities to schedule recycling services and regular pick-ups. EC Developments will also ensure the implementation of proper resource disposal techniques for the removal of all regulated and toxic materials, including lamps, nutrient waste, and applicable electronics.

#### 5. Recyclable Material Selection

EC Developments will use biodegradable and recyclable packaging for all storage, handling, and packaging needs. EC Developments will strive to reuse all internal packaging products for as long as those products remain functional, in an effort to reduce the consumption of unnecessary resources. Furthermore, EC Developments will take specific sanitation measures to elongate the lifespan of internal storage, labeling, and packaging products. All employees will also be trained in source-separation of any metals and packaging materials. EC Developments will engage with local waste management authorities to schedule recycling services and regular pick-ups.

#### 6. Reusable Supplies in Operations

EC Developments will incorporate reusable materials and supplies for all available cultivation and production functions, such as vessels used for containing plants, nutrients, soil, and water. EC Developments will also incorporate reusable tools made from recycled materials for cultivation, such as plant-reinforcement posts, watering and spraying devices, reflective materials, and storage containers. These supplies will be reused after a chemical-free (hot steam) sterilization process, and will reduce the resource consumption and needs of EC Developments.

#### 7. Paperless Communication

To reduce EC Developments' paper waste, email and other direct messaging services will be used as the primary channel of communication among management, employees, customer facilities, and vendors. EC Developments will use secure, cloud-based tracking systems to store electronic versions of all compliance-related forms and documents, allowing for mobile access in accordance with the CCC, and the reduction of paper.

#### 8. Strict Policy of No Pesticides, Other Than OMRI-Listed, for Pest Control

As discussed in detail above, EC Developments will use a combination of physical controls, proactive plant care, and seek to utilize OMRI-listed organic products to keep out and mitigate pests. These less harmful, alternative pest control methods also include the introduction of predatory insects, naturally derived foliar sprays, and a range of organic applications. By utilizing organic pest control methods, EC Developments will minimize toxic wastewater or runoff produced, as well as employee and customer exposure. In this spirit, steam cleaning methods will be applied during pest control efforts, as well as during standard sanitization and cleaning procedures.



#### 9. Water Use and Plans to Minimize Water Consumption Facility-Wide

EC Developments has purposefully designed its facility and operations to strike the right balance between maximizing water and energy efficiency, and achieving the highest yield per plant. Accordingly, EC Developments will refrain from operating a completely hydroponic cultivation system due to its energy inefficiency. Hydroponic cultivation also produces more nutrient pollution when compared to other growing methods. Likewise, reverse osmosis water filtration methods will also be avoided due to inefficiency.

Plumbing will be constructed so that only sufficient quantities of water will be required. Therefore, low-flush, commercial grade toilets by such brands as TOTO or American Standard, or similarly cost-effective brands, will be installed in EC Developments' restrooms. To further reduce water and power consumption in bathrooms, EC Developments will install automatic sinks by MOEN and hand dryers by Dyson, or other equally efficient brands.

Through its sensor technology, these water fountains are a unique way to minimize water waste and the use of plastic water bottles. These stations require minimal space and are integral to EC Developments' ADA-compliant facility design plan. The water bottle filler features its sanitary non-touch sensor activation with an automatic 20-second shut-off timer.

For maximum control and cost-efficiency, EC Developments will source its water from the municipality. Likewise, EC Developments is committed to reducing waste and controlling water runoffs. Similar to its plumbing system, EC Developments will implement a combination of automated and manual watering systems. This will include water filtration systems, automated mixing tanks, delivery manifolds with pressure pumps, manual control valves for drip irrigation, and flood tables to irrigate cannabis crops. EC Developments will also measure runoff from watering events and report this volume in its water usage plan; on average, watering events will have no more than 20% water runoff. EC Developments further recognizes that many operational processes exist within its facility that produce water as a waste product that can be captured and repurposed. To the best of its ability, EC Developments will capture and filter HVAC condensate, dehumidification water, excess runoff from irrigation, and other wastewater, then utilize it in other processes at the cultivation operation. By being precise about the amount of water each plant requires in the various growth stages, EC Developments will mitigate overwatering cannabis plants and wasting water. By reclaiming condensate, EC Developments will recapture the water that was evaporated and reuse it, rendering the cultivation operation essentially a net-zero water consumption process.

#### 10. Capturing and Treating Wastewater and Runoff

EC Developments will take the same approach to wastewater management and treatment as it does with pests, cannabis waste, and theft — that is, prophylactically mitigate against foreseeable

risk early in an effort to minimize the need for aggressive *and costly* remedial action later. More specifically, from the outset, EC Developments will not produce toxic wastewater or runoff during its cultivation of cannabis. EC Developments will use water in a targeted, planned, and efficient manner with appropriate amounts and frequency so as to meet the needs of the crop while reducing the total amount of water used or wasted. To ensure all runoff water is kept clean of contaminants prior to recycling and reapplication, EC Developments will use organic supplementary resources. The use of such organic supplementary resources will eliminate exposure to any pesticides, including OMRI-listed organic products, synthetic additives, and the creation of toxic wastewater.

From the outset, EC Developments will implement stormwater management best practices through low impact development (LID) of its facility. This includes the reduction of runoff, compliant site grading, increased vegetation to absorb and curb water runoff, as well as the avoidance of erosion, flooding, or pollution. More specifically, these practices include the use of vegetated filter strips and organic filters, which serve to infiltrate runoff through a sand bed to remove floatables, particulate metals, and pollutants.

EC Developments' plan for the treatment of wastewater and runoff also includes collecting rainwater from the grow room roof and floor drains (which are rarely used) into a holding tank which will then dispense grey water for irrigation of the landscape. Since irrigation is a closed loop system, the likelihood of wastewater seeping in is exceedingly low, if not impossible. Additionally, EC Developments will conduct periodic analysis of the holding tank and promptly treat the tank should there be unacceptable levels of toxicity. Alternatively, and/or to supplement these undertakings, EC Developments will explore other efficient and environmentally conscious measures.

This area will be constructed as a shallow, landscaped depression that permits runoff to a designated area. The bioretention area, otherwise known as a rain garden, will then filter runoff through soil and vegetation. This method is a design-friendly approach that not only minimizes runoff, but also provides a visually appealing entrance into the facility for employees and visitors. EC Developments will excavate up to seven foot trenches, line them, and fill them with aggregate to collect stormwater that will be slowly released back into the soil. EC Developments will regularly maintain these bioretention areas so that the area remains clear of clogs and continues to filter water runoff effectively.

In addition to the water aggregate and filtering methods described above, EC Developments will implement permeable groundwork on the outside of the facility. These areas will be built on top of aggregate that filters water and directs it to local groundwater supplies. This method is effective in handling water runoff, but also promotes infiltration.

Taking guidance from the EPA headquarters in Washington, D.C., EC Developments will implement rain cisterns as a method through which to collect rainwater that falls from the facility's roof downspouts, and irrigate the landscaping surrounding the facility.

Through this proactive, multi-system approach to conserving water and reducing wastewater, EC Developments is fulfilling its commitment to being a good environmental steward.

#### 11. EC Developments' Plan to Use Alternative Energy and Treat Exchanged Air

Projected means of offsetting energy usage includes EC Developments' plan to purchase carbon offsets to mitigate greenhouse gas emissions from EC Developments' electricity usage, transportation, solar panel incentives, and other available energy-saving business practices.

More specifically, the use of dark roofing materials increases sunlight absorption and can elevate the internal temperature of the corresponding facility. However, by installing a green roof, white roof, or solar panels, EC Developments can create roof shade or increase the reflectance of the roof, subsequently reducing cooling costs within the facility. The ability of a roofing surface to reflect sunlight can notably reduce interior temperatures, therefore, reducing cooling costs associated with the operation of cannabis facilities.

##### (a) Energy Efficiency and Collaboration with Local Electric Companies

During construction, EC Developments will seek to achieve an R18-R20 insulation rating, which exceeds the U.S. Department of Energy's recommendation. Better insulation will also reduce the amount of energy needed to heat and cool the facility. EC Developments will also schedule indoor lighting cycles during the night to reduce electricity demand during the day, eliminating excess energy used for heating during the night hours and air conditioning during the day, significantly reducing the climate effect. EC Developments will have its local energy provider conduct an energy audit after the buildout is complete to advise on energy-saving measures. Once EC Developments' facility is operational, an energy consultant will be contracted to perform monthly energy audits and systems evaluations for the first 18 months of operation and quarterly thereafter. EC Developments' energy consultant will use the EPA's web-based evaluation tool on a monthly basis, in order to calculate and benchmark the building's energy rating and energy performance against other similar businesses. EC Developments intends to achieve the EPA's Energy Star® Certification within the first 18 months of operation, which requires 12 consecutive months of a score of 75 or higher, on a scale of 1-100. The energy consultant will work with EC Developments on a continual basis, in order to reach and maintain Energy Star® Certification, and continually work towards pushing EC Developments' operations towards greener and more environmentally responsible practices.

To achieve this important outcome, EC Developments' leadership will establish a collaborative relationship with the local electric company, county and city governments, as well as local

commercial businesses to identify energy-efficient best practices. Pending availability, EC Developments may consult with an Energy Conservation Advisor during pre-construction to identify best available ways to conserve energy and protect the environment. This dialogue will be ongoing, in order to continuously improve and minimize energy drain.

(b) Use of Alternative Energy and Energy Saving Innovation

As described above, EC Developments will continuously explore all alternative energy-conserving practices. This specifically includes the use of solar panels on the facility roof; EC Developments is conducting appropriate due diligence in this regard. Additionally, EC Developments will identify opportunities for energy rebates.

(c) Environmental Stewardship Includes Proper Waste Management

As discussed in detail above, EC Developments' efficient production operations will significantly reduce cannabis waste. For instance, the Integrated Pest Management (IPM) plan to protect crops combined with proactive plant care to detect disease early, will minimize cannabis waste associated with disease or contamination. EC Developments provided above its comprehensive system for systematically collecting and properly destroying all waste materials containing cannabis. Should the Commission permit, EC Developments will utilize an incinerator on the premises. Incinerators effectively reduce more than 90% of cannabis waste to sterile ash, which can then be composted in the field, this is a proven efficient and environmentally conscious approach to waste destruction. Furthermore, incineration is cleaner than most other forms of emission, and it generates no ground or water contamination. EC Developments will work with the Commission to ensure that its energy efficiency plans comply with all rules and regulations.

(i) Efficient and Safe Disposal of Laboratory Waste

The in-house laboratory will dispose of any flammable solvents, as well as other waste streams, with a certified laboratory waste disposal company. To dispose of any leftover cannabis that was not used in the sample analysis process, the lab staff will place such cannabis, products, and containers inside a waste disposal drum. The drum, at the time of disposal, will contain approximately 70% liquid lab waste (i.e., flammable solvents, etc.) and about 30% solid waste (i.e., containers, vials, plates). All cannabis and cannabis products that are disposed of are rendered unrecognizable and unusable once inside the drum and saturated in a solvent. The waste disposal company will be the last person in the chain of custody, as drums are incinerated or disposed of in accordance with state and local laboratory waste disposal guidelines. A rigorous chain of custody will be maintained to ensure cannabis that has failed laboratory testing is not released for distribution, in compliance with CCC regulations. All cannabis products waiting for laboratory analysis are held in quarantine. Upon notice of a failed batch, the Quality Assurance Manager (QAM) will oversee the disposal of the batch in the presence of one witness and under the surveillance of security cameras.

(ii) Proper Handling, Storage, and Disposal of Chemicals and Solvent Waste

To protect the health and safety of humans, cannabis plants, and the environment, EC Developments has purposefully chosen to minimize the presence of/or exposure to harmful chemicals throughout all operations. As discussed above, the company will use only organic cleaning products, disinfectants, and pesticides facility-wide. Such products may include Green Cleaner™ insecticide, and biological, citrus-based fungicides such as RootShield™ in the cultivation area. In this same spirit, EC Developments' use of chemicals in cultivation and production operations will be exceedingly low.

While these organic products are far less toxic and hazardous relative to other chemical-based products, EC Developments will take care to safely store them and train all employees on proper handling. Guided by standards set by the the EPA and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and to mitigate mishandling or spills, all pesticides will be stored in a designated metal cabinet in a room away from the cultivation area and cannabis plants, and separate from water resources and production areas. The cabinet will be locked at all times, and only those employees who are trained in pesticide use will be permitted access. The storage room will be properly identified with a sign stating, "Organic Pesticide Storage Area." A list of the products being stored in the cabinet will be posted on the cabinet and outside the storage room. Likewise, cleaning products including hand sanitizers, soaps, and isopropyl alcohol will be stored in a clearly labeled metal cabinet in a distinct area or areas away from plants and processing operations. Employees will wear appropriate personal protection equipment when handling pesticides and ethanol, and chemical spill kits will be proximally located in the event a spill occurs during preparations.

Consistent with these safety-centric and environmentally conscious product, storage, and handling choices, EC Developments will dispose of any chemical residue in a responsible manner that minimizes adverse environmental impact. More specifically, EC Developments' equipment or other items used to store, handle, or transport pesticides, will be triple-rinsed in a separate container. Once diluted, the residue will then be disposed of using a hybrid approach intended to lessen the burden on both the environment and the municipal water system. Employees will be trained to deposit rinsed water *primarily* into floor drains that will run to holding tanks, after which the water will be treated and irrigated. Alternatively, some rinsed water may also be deposited into sinks that drain into the municipal system. Of course, bathroom water from showers and hand washing (with organic soaps and sanitizers) will also drain into this system. Thus, it is important to note again that EC Developments has thoughtfully designed its entire facility to optimize operational efficiencies while minimizing water usage and other environmental impact.

(d) Empowering Employees to be Green Ambassadors

As a corporate citizen of Franklin County, EC Developments will continuously strive to be a steward of the environment and the community at large. This ethos extends to its employees who will be trained on environmental stewardship strategies and tactics during onboarding. They may also be incentivized (if needed) to facilitate their understanding of green practices and to participate in local efforts to minimize adverse environmental impact.

## **PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS**

### **1. Background Checks**

EC Development's Human Resources Manager (HRM) will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. Any applicant who has submitted a complete application for employment will have a professional background check conducted. This investigation will be in addition to verification that the potential agent is, or will soon be, licensed as a cannabis agent or employee, and therefore, allowed to work in the facility. The investigation will be conducted to ensure the potential agent does not have any convictions or records that would bar them from employment. The investigation will also check for any crimes of tax fraud or evasion, theft, or moral turpitude, whether misdemeanors or felony. Any indication of past crimes of moral turpitude will be a bar to employment. Potential employees will be denied employment as a result of certain felony charges, theft, embezzlement, certain drug and paraphernalia charges, and any other convictions that restrict employment as designated by the Cannabis Control Commission (the Commission).

The following searches may be performed, depending upon the type of position the candidate is seeking:

#### **(1) Member-Contributory Theft Information Database**

EC Developments will use a member-based program where companies share agent theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and will be available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources;

#### **(2) National Crime File Search**

Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources is utilized, including Sex Offender Registries, state and county criminal courts, and state-level departments of corrections. This search can provide instant results, depending on the provider;

#### **(3) Felony and Misdemeanor Search**

This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location; and

#### **(4) Motor Vehicle Report**

A Motor Vehicle Report (MVR) reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving responsibilities, including those who will not only drive a company vehicle, but who may also drive a personal vehicle on company time or for business purposes.

EC Developments' HRM will utilize the following verification and qualification solutions, depending on the level of security required for the position:

(1) Social Security Number Verification (SSNV)

This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report;

(2) Employment and Education Verification

EC Developments will integrate instant and automated employment screening products into the hiring process. Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as Social Security number or name and address history. Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications. Following a successful first interview, EC Developments will initiate a background check. Once the candidate has passed a background check, subsequent interviews will be conducted, depending on the position;

(3) Adjudication and Alerts

EC Developments will provide a criminal records adjudication policy as part of the screening process. Fair Credit Reporting Act (FCRA) mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates;

(4) Drug Screening

EC Developments will utilize a drug testing service provider who will track results, provide reports, and ensure the company stays in compliance with the Commission and State regulations. The HRM will develop and update drug testing policies. A basic DOT Five Panel Drug Test (urine conventional) will be utilized. Cannabis use by a qualified patient is not a disqualification for employment. The following drugs will be tested from the applicant's urine sample: Amphetamines (amphetamine and methamphetamine), benzoylecgonine (cocaine metabolite), cannabinoids (cannabis metabolite and THC-COOH), opiates (codeine and morphine), and phencyclidine (PCP). The HRM will cause all required criminal and drug screens to be updated every two years. All agents are required to notify the company whenever they have any



encounter with law enforcement. The HRM will determine if an additional background screening should be performed upon the agent's notice. A post-accident drug screening may be performed at the HRM's discretion or if required for worker's compensation purposes;

#### (5) First Interview

The first interview will comprise a face-to-face meeting with the manager of the division in which the applicant is interviewing for a position. No more than five applicants will be selected for a first interview. The purpose of this interview will be to help determine the applicant's level of knowledge regarding cannabis operations; existing skill-set relevant to the duties of the job offered; the applicant's capacity to learn new skills and grasp concepts (specifically regulatory concepts); and the potential to commit theft or fraud. At least two references will be contacted and details of the interview confirmed. A solid background (or an appropriate level of education/experience relating to the position offered), a clean record, and indicia of honesty will be requisites for the second interview; and

#### (6) Final Interview

The final interview will be conducted by the General Manager (GM). No more than three candidates will be selected for the final interview. The GM will ask a variety of questions intended to assess the applicant's ability to interact with others and work according to EC Developments' policies. The final decision will be made by the GM with input from the manager who conducted the first interview and the HRM. For management positions, the HRM and the GM will jointly conduct the final interview after consulting with managing members. All potential agents must go through the entire process. Each new hire will begin work on a three month probationary period of employment. At the end of the three months, the new hire's division manager will conduct an assessment of the agent's performance.

Background checks will be conducted on all agents in their capacity as employees or volunteers for EC Developments pursuant to 935 CMR 500.100 and will be used by its security officer, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: CORI 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 500.101(1), EC Developments will consider 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; all criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability; and 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, EC Developments will comply with all guidance provided by the Commission and 935 CMR 500.802 to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination. EC Developments will also consider whether offenses or information that would result in a presumptive negative suitability determination under 935 CMR 500.802. In the event of a presumptive negative suitability determination, EC Developments will consider the following factors:

- Time since the offense or incident;
- Age of the subject at the time of the offense or incident;
- Nature and specific circumstances of the offense or incident;
- Sentence imposed and length, if any, of incarceration, if criminal;
- Penalty or discipline imposed, including damages awarded, if civil or administrative;
- Relationship of offense or incident to nature of work to be performed;
- Number of offenses or incidents;
- Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
- 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
- Any other relevant information, including information submitted by the subject.

All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. 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 EC Developments or the Commission.

As stated above, EC Developments is committed to being an equal opportunity employer that hires individuals who are most qualified for the desired position regardless of race; height or weight; credit rating or economic status; religious affiliation or beliefs; citizenship; marital status or number of children; gender; sexual orientation; arrest or conviction; security/background

checks for certain religious or ethnic groups; disability; or medical questions and examinations. Through its AA Plan, EC Developments' HRM will ensure individuals from all backgrounds are given equal opportunity for employment. EC Developments will utilize the Commission's retrospective study to ensure its compliance with the ideals of the Commission in its diverse hiring practices, prohibition of discrimination based on race, gender, and ongoing training. By example, EC Developments will ensure its job postings are located in a single conspicuous place where employees are trained to look for important announcements and information. Further, jobs will be posted for 14 days, at minimum, to provide ample time for respondents. As is provided, EC Developments will seek to promote from its internal staff when possible so as to provide meaningful advancement opportunities for its employees.

The HRM will utilize state and federal laws and executive orders to guide policies and procedures. Internal audits will be performed at least yearly to determine if EC Developments is maintaining inclusivity in its hiring practices. All agents will be educated on these policies and procedures in order to promote a workplace committed to equity in the workplace as well as to keep the company accountable for all actions.

All qualified individuals will be given a fair opportunity to interview for a position at EC Developments as well as a fair opportunity to move laterally or be promoted. All employment opportunities will be posted internally before externally to give current employees an opportunity for promotion. These vacancies will be posted in locations that are prominently visible and equally available for all employees to access so as not to exclude any employee from the opportunity.

As part of its onboarding training, as described further in its Qualifications and Training Plan provided within this Application, EC Developments does not permit alcohol, smoking, or the use of drugs in its workplace. As part of its alcohol, smoke, and drug-free workplace policies and in compliance with 935 CMR 500.105(1), employees will not be permitted to participate in these prohibited activities. Additional training will also include the following, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained, and EC Development's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d).

In compliance with 935 CMR 500.105(1), all agents will all learn about EC Development's policy for the immediate dismissal of any marijuana establishment agent who has:

- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
- Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall 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.

## 2. Personnel Policies Regarding Written Operating Procedures and Recordkeeping

In compliance with 935 CMR 500.105(9), staffing plans and staffing records of EC Developments will be made available for inspection by the Commission, upon request. The records of the establishment will be maintained in accordance with generally accepted accounting principles (GAAP). Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) The following personnel records:
  - (i) Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
  - (ii) A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
    - (1) all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - (2) documentation of verification of references;
    - (3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - (4) documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    - (5) documentation of periodic performance evaluations;
    - (6) A record of any disciplinary action taken; and
    - (7) Notice of completed responsible vendor and equigh-hour related duty training.
  - (iii) A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  - (iv) Personnel policies and procedures; and
  - (v) All background check reports obtained in accordance with 935 CMR 500.030.

- (e) Business records, which shall include manual or computerized records of:
  - (i) Assets and liabilities;
  - (ii) Monetary transactions;
  - (iii) Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
  - (iv) Sales records including the quantity, form, and cost of marijuana products; and
  - (v) Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- (f) Waste Disposal records as required under 935 CMR 500.105(12); and
- (g) Following closure of EC Developments, all records will be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission

In compliance with 935 CMR 500.105(1), EC Developments shall have and follow a set of detailed written operating procedures. If the establishment has a second location, it shall develop and follow a set of such operating procedures for that facility. Operating procedures shall include, but need not be limited to the following:

- (a) Security measures in compliance with 935 CMR 500.110;
- (b) Employee security policies, including personal safety and crime prevention techniques;
- (c) A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- (d) Storage of marijuana in compliance with 935 CMR 500.105(11);
- (e) 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;
- (f) Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- (g) Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- (h) A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- (i) Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (j) Alcohol, smoke, and drug-free workplace policies;
- (k) A plan describing how confidential information will be maintained;
- (l) A policy for the immediate dismissal of any marijuana establishment agent who has:
  - (i) Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  - (ii) Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or

- (iii) 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.
- (m) A list of all board members and executives of EC Developments, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
- (n) Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- (o) Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- (p) Policies and procedures for energy efficiency and conservation that shall include:
  - (i) 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;
  - (ii) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
  - (iii) Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - (iv) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

In compliance with 935 CMR500.105(1), all 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. All confidential information will be made available to the Commission as requested by it.



## **RESTRICTING ACCESS TO AGE 21 AND OLDER**

EC Developments' Security Officer (SO) will ensure the ongoing safety of employees and authorized visitors by implementing the following security protocols. When a visitor arrives, she or he will first enter a secured entry room which prevents further access to non-authorized areas by means of a commercial grade steel door, which is kept locked. This small area enables registered facility employees to verify the person's credentials, as described below, and inquire about the reason for the visit. A sign will be conspicuously posted on every entrance that reads:

**THESE PREMISES ARE UNDER 24/7 VIDEO SURVEILLANCE.  
ONLY AUTHORIZED VISITORS ARE PERMITTED TO ENTER**

For purposes of this section, a visitor is anyone who is permitted to be on the premises, but is not an employee. Visitors include guests, members of the Cannabis Control Commission (the Commission), other regulators, law enforcement officials, and short-term contract (workers such as a plumber to repair a leak or technician to install internet access for the tracking system). When an approved vendor or visitor arrives at the facility, the SO or agent will greet the visitor, establish eye contact, verify the visitor is expected and has the appropriate approval, and ask the visitor to provide a valid photo identification and scan or copy it (regulatory agency representatives and law enforcement officers will be asked to show an official identification card). The SO or agent will verify the visitor's identification is compliant, either as a motor vehicle operator's (driver's) license; registration certificate issued under the Military Selective Service Act; an identification card issued to a member of the Armed Forces; or another document issued by a federal, state, county, or municipal government; and permit the individual to enter the facility. Visitors without valid government ID will not be admitted to the facility. This will enable EC Developments to ensure that all visitors are at least 21 years of age or older. All employees and registered agents will also be 21 years of age or older, in compliance with 935 CMR 500.030 (any laboratory agent attending EC Development's establishment, must also be 21 years of age or older, in compliance with 935 CMR 500.029). The individual will be issued a visitor badge and direct them to wear the badge in a conspicuous place so it remains visible at all times. The SO or agent will explain that the badge is property of the company and must be returned before leaving. The SO or agent will use a communication device such as a walkie-talkie, to call the manager in charge to escort and monitor the visitor at all times in the facility. Finally, the SO or agent will request that the individual sign and date the EC Developments Visitor Log.

The Visitor Log will include the following information:

- Name;
- Company name;
- Purpose of visit;



- Badge number assigned;
- Date of visit;
- Time in and Time out;
- Areas of facility that were visited; and
- Name of each employee who was visited.

Visitors will be required to sign in and out on a paper form as follows:

<b>VISITOR LOG</b> <i>Facility access by anyone other than badged employees must be documented. Visitors must visibly display a visitor badge at all times and fill out columns 1 - 11 below.</i>											
Date	Assigned Visitor Badge ID #	Visitor First and Last Name (print)	Company Name	Visitor Signature	Purpose for Visit	ID State & Number	Time In	Time Out	Facility Areas visited	Name(s) of Employees Visited	Escort Initials

*Image depicting EC Developments' sample visitor log*

The SO will transfer this information into EC Development's digital catalog to ensure the ongoing monitoring of visits. The Chief Compliance Officer (CCO) is ultimately responsible for ensuring that the visitor log is stored as a part of EC Developments' Record Keeping system. The company will maintain visitor logs and copies of government-issued IDs in the facility's secure records room for a period of three years; upon the request of the Commission, the NJSCI, or local law enforcement if appropriate, EC Developments will provide the visitor log for inspection. The SO or employee will also make a photocopy of each visitor's government-issued ID and retain it with the log. If an individual is found using fake, forged, or fabricated identification, the SO will immediately scan the information for company files, notify the police, and report the minor to his/her parent(s) or legal guardian(s).

All visitors will clearly display on their clothing a visitor badge throughout their visit to EC Developments' facility. The visitor badge is attached to a lanyard that can be worn around the neck. The badge itself contains the visitor's name and company name, plus the word "VISITOR" on the badge. For example, construction workers who need to enter the premises to complete a repair will receive an ID from EC Developments which will be worn at all times. No visitor who

is given access to the facility will be left unsupervised while on the premises. The SO or manager in charge will be required to monitor and accompany the visitor(s) during their entire time in the facility. All employees will be trained to not only observe the actions of visitors to prevent product diversion, but will also to monitor closely to encourage visitors not to touch any cannabis plants or products to avoid contamination.

For the safety of all individuals at the facility, photography or video recording by employees or visitors within any part of the facility is strictly prohibited. Any person who is caught taking photos or videos will be asked to delete them immediately. Employees or visitors who repeatedly ignore this rule will be asked not to return.

## QUALIFICATIONS AND TRAINING

### 1. Ensuring Ongoing Safety, Compliance, and Quality Through Onboarding and Ongoing Training of Employees

Each of EC Developments' departments will be managed by a highly qualified leader who will focus on instilling their staff with EC Developments' vision and values, as well as the skills and training required to ensure delivery of the highest quality service and products. These leaders will also be charged with maintaining and updating the policies, which will ensure that EC Developments' team members have the proper skills, as well as appropriate training and education. All employees, regardless of function, will receive comprehensive training prior to working in the facility or handling cannabis. Training programs will be tailored to the roles and responsibilities of the job function of each employee.

Consistent with its culture of compliance and best practices, EC Developments will maintain the *EC Developments Staffing and Training Manual* containing all applicable policies and procedures, which will be prepared in accordance with current regulatory requirements, be continuously improved, and made easily accessible both electronically and in paper form for inspection. The *EC Developments Staffing and Training Manual* will be housed in an electronic cloud-based portal, which will allow for immediate access of communication and application of new training and education. Also housed in the same portal will be a comprehensive curriculum of the following topics: Basic plant and product science, a pharmacology overview, state and local law FAQs, and quick reference guides (QRGs) concerning pain management.

EC Developments encourages personal growth, professional development, and employee empowerment. All team members are encouraged to provide input and suggest new policies and processes that empower learning, as well as provide feedback to optimize EC Developments' daily operations. In addition, each employee will have scheduled weekly touch-bases with management to allow a transparent exchange of constructive feedback.

#### (a) Employee Training Overview

All new team members will be required to undergo rigorous training, in accordance with the above-described *EC Developments Staffing and Training Manual*, and will further be advised of all employment policies, the life cycle of cannabis and its growth process, and the procedures applicable to specific job functions. Educational training will comprise written and e-learning presentations provided by management and other team leaders with relevant subject matter expertise. The presentations will be supplemented with hands-on training to demonstrate the material shared. Each team member will have a personalized training path tailored to her or his role, which will allow for internal growth and promotional development.

EC Developments proactively provides employees with progressive training and interactive

learning. This begins with providing orientation training for all new hires. No employee or consultant may work on-site before receiving new hire orientation training. The Chief Operating Officer (COO) will ensure each employee is provided all relevant and adequate training tailored to the roles and responsibilities of the job function of each employee, and at a minimum must include training on confidentiality, security controls, emergency response protocols, and regulatory compliance, as well as federal statutes regarding the use of cannabis. Each employee will receive a minimum of eight hours of ongoing compliance training annually or as deemed necessary by the COO, in addition to her or his prescribed learning and development path for promotion.

(i) Administrative Matters

During the first day of training, an employee day-one manual will be issued to all employees. The manual will set forth EC Developments' policy regarding administrative matters, including terms of employment, what is expected of employees, and procedures for discipline. It will also include information on employee compensation and benefits. As a result, each employee must read and sign a statement acknowledging they have received, read, and understood EC Developments' policies, their compensation, and their eligible benefits.

(ii) Commencement of Onboarding

After all administrative matters are covered and acknowledged by each employee, EC Developments will begin its onboarding training. The company utilizes a robust onboarding training program covering various topics, such as new employee onboarding, mentoring, monthly departmental meetings, compliance, regulation and the law, safety training, security training, emergency and incident management, inventory management and diversion prevention, cannabis science, recordkeeping, product handling and sanitation, and recall handling. When deemed necessary, EC Developments will bring in third-party training consultants who will teach employees ongoing policy updates and other employment issues. In support, the COO will reassess all modules annually to determine if updated training is necessary to maintain a compliant operation.

(b) Responsible Vendor Training

In compliance with 935 CMR 500.105(2), EC Developments will provide a Responsible Vendor Program to all onboarding employees (within 90 days of hire) as well as eight hours of on-going training annually. The program will include all items required by 935 CMR 500.105(7), including:

- The effect of cannabis on the human body;
- Diversion prevention;
- Compliance with all tracking requirements
- Acceptable forms of identification

- State laws and rules affecting owners, manager, and employees (e.g. incident and notification requirements, waste disposal, sanctions, health and safety standards, etc.)

(c) Onboarding Training Program (45 hours)

In compliance with 935 CMR 500.105(2), EC Developments' robust *Agent Training Plan* ensures that all of its agents, prior to executing their role and performing their job functions, understand the rules, laws, security measures, operating procedures, and their specific duties. The leadership of EC Developments is confident that its tried and true processes will ensure the business remains safe, secure, and compliant.

EC Developments' onboarding training program will take a minimum of 45 hours, broken down into the following categories.

After successful completion of the Basic Core Curriculum, each agent involved in the handling or sale of cannabis for adult use shall fulfill the four-hour Responsible Vendor Training requirement every year thereafter for EC Developments to maintain designation as a Responsible Vendor, as required by 935 CMR 500.105(2). Once EC Developments is designated a Responsible Vendor, all agents involved in the handling or sale of marijuana for adult use, shall successfully complete the Basic Court Curriculum within 90 days of hire. 935 CMR 500.105(2).

Should EC Developments obtain its Delivery Endorsement, all agents acting as delivery employees will have attended and successfully completed Delivery Core Curriculum, as required by 935 CMR 500.105(2).

(d) Standard Operating Procedures (SOPs) and Separation of Operations (4 hours)

During each department's onboarding program, agents will learn how SOPs help create a successful operation. EC Developments' Employee Handbook provides the basis for this training, as it is designed to acquaint agents with the company and provide information about – among other topics – SOPs, working conditions, policies affecting employment, requirements for agents' understanding of rules and laws, and cultivation facility security measures. Hands-on training specific to each position will also be provided by the manager-level employees (PM and QAM) – this type of training allows agents to conduct each relevant SOP in a controlled, supervised environment, ensuring agents can perform tasks before working at their positions.

Agents will receive education on the topic-specific items listed in the Employee Handbook through in-classroom education, quizzes, security training, and shadowing. As part of the shadowing process, agents will work with a supervisory level agent who will help them navigate “real world” examples of issues that may occur on a daily basis. Agents will also experience situations that textbooks and modules may not anticipate. Beyond training and shadowing, agents will be encouraged to ask ongoing questions about processes to ensure their responses to

situations follow the methods outlined in the SOPs. Supervisors will help agents navigate their SOPs and Employee Handbooks to find the correct answer(s) to their questions so they can actively learn rather than passively accept an answer. If the number and type of questions warrant re-training, a supervisor may require an agent to re-take certain portions of the onboarding courses and training modules.

These SOPs will be updated as often as necessary to maintain compliance with all laws and regulations governing the company's operations. The Chief Executive Officer (CEO) and COO will work together to oversee the implementation of the SOPs into the company, while leaning on the expertise of its CM. Each department lead will work with the COO in the instance of any required revisions, additions, or amendments to the SOPs based on regulatory changes, as well as for any guidance or directives published by the Cannabis Control Commission (the Commission). These manager-level agents are responsible for drafting, updating, maintaining records of training, and adhering to SOPs in their areas of supervision. Should EC Developments modify any SOPs, agents will be re-trained as soon as possible. All records, including those related to employees' responsible vendor training program compliance, will be maintained for four years and made available for inspection by the Commission or any other applicable licensing authority upon request during normal business hours. *See* 935 CMR 500.105(2)(b).

(i) Cultivation-Specific SOPs (13 hours)

Applicant's Cultivation Operation SOPs will promote world-class growing and handling practices. These SOPs will include a robust sanitation protocol that requires all team members to practice good hygiene and wear protective clothing as necessary to protect the product and themselves from exposure to potential contaminants. These SOPs will require high-quality standards to all cultivation rooms and processes. All raw materials will be tested to meet exacting quality benchmarks, and audits of key suppliers will be regularly conducted. As part of the SOP requirements, agents will wear pocketless uniform scrubs while in the licensed grower premises. Agents will also follow Food and Drug Administration (FDA) hand washing protocols. Proper cleaning will be performed regularly throughout the operations to maintain an environment that is free of contaminants.

Applicant will implement a rigorous training program to promote fully compliant cultivation and transfer of cannabis through strict adherence to New Jersey regulations and industry-wide safety, security, integrity, and transparency best practices. This training program will be highly regulatory versus operationally focused. The core curriculum will comprise the following, at minimum:

Part I - The Law and Management Best Practice

- Occupational Safety and Health Administration (OSHA) Requirements;
- Hazard Communication;

- Personal Protective Equipment;
- Respiratory Protection;
- Emergency Response;
- Training Requirements; and
- Mitigating and Aggravating Factors.

#### Part II - The Licensed Premises

- Limited Access Areas;
- Possession of Licensed Premises;
- Changing, Altering, or Modifying The Licensed Premises;
- Operational Separation;
- Security Alarm Systems & Lock Standards;
- Video Surveillance;
- Cannabis Waste;
- Transport; and
- Recordkeeping.

#### Part III - Cannabis Cultivation Facilities

- License Privileges;
- General Limitations or Prohibited Acts;
- Inventory Tracking System;
- Health and Safety Regulations;
- Fire Marshal Cannabis Facility Guidelines; and
- New Jersey Occupational Health & Safety Guidelines.

#### Part IV - Testing, Labeling, Packaging and Product Safety

- Packaging & Labeling Requirements Prior to Transfer to a Cannabis Establishment;
- Packaging & Labeling Requirements;
- Additional Labeling Requirements;
- Cannabis & Cannabis Product Testing Program;
- Cannabis Testing Program – Sampling Procedures; and
- Contaminated Product and Failed Tests.

Cultivation agents will be trained on procedures to gain entry to the facility. Once granted entrance, they will then be directed where to go to put on their coverall uniforms. Next, new employees will be walked sequentially through each cultivation room, starting from the propagation and staging area. Here they will learn the proper humidity levels, CO<sub>2</sub> levels, and lighting controls to maintain healthy plants. Following that segment of training, they will be taught how to accurately record the initial process and when the transfer into the vegetative stage

will begin. They will learn how to thoughtfully and fragiley transfer the plants while in full view of the cameras, as well as how to set the next stage's environmental controls. New employees will understand the importance of lighting cycles within each room and how to avoid disease and pests. They will shadow experienced agents who will ensure their proper application of nutrients and water. Another important step in the training process will be for employees to learn to meticulously record this information and understand its usefulness in ensuring the cultivation of a healthy, pesticide-free crop.

Applicant will implement Current Cultivation Good Manufacturing Practices (cCGMP) to its cultivation rooms and processes, and will design the facility to adhere to sanitation procedures and protocols; the design will include a sanitation room that all employees will be required to utilize upon entering and exiting the facility. This checkpoint will help avoid any potential cross-contamination. Ongoing training will also be provided to ensure sanitation procedures are strictly adhered to by all employees.

(e) Cannabis Fundamentals (4 hours)

EC Developments understands that learning about cannabis provides all employees with a sense of responsibility to ensure its safe and sanitary cultivation. Thus, EC Developments will also provide onboarding training of the fundamentals of cannabis, including topics such as the biology and botany of cannabis, the endocannabinoid system, cannabinoids and terpenes, proper dosing protocols, proper genetic selection, seed germination, plant cloning, soil techniques, lighting options and photoperiod principals, watering and nutrient cycles, maximizing quality and yields, natural pest management and disease control, harvesting tools and techniques, drying and curing techniques, infusion techniques, extraction methodology, food safety and sanitation, cannabis chemistry, cannabinoid formulations, lab result interpretations, and much more. These topics will impart essential practices and skills for all agents and employees of EC Developments. Cultivation agents must conceptualize the end-product in order to understand the importance of stringent sanitary practices and thoughtful labeling techniques.

EC Developments will provide access to a “cannabis library” containing information regarding each of the above materials for on-the-job reading and training purposes. Such training and materials demonstrate that EC Developments seeks to truly invest in its employees’ educational growth.

(f) Safety and Security Equipment, and Protocols and Anti-Diversion Protocols (8 hours)

EC Developments has identified security protocols and will introduce anti-diversion policies and training programs to ensure the prevention of diversion. Company policies include strict control measures to prevent employee or third-party theft or loss. Supply chain security is designated as a primary job duty of all employees and managers, reinforcing a company-wide culture of responsibility. The Security Officer will be responsible for the development and implementation



of all anti-diversion measures, including policy formation and annual training. The managers at the cultivation facility are responsible for plan oversight.

The safety and security of EC Developments' agents are its primary concern. Therefore, from onboarding through ongoing training, EC Developments' agents develop a thorough understanding of security measures and operating procedures within each operation. Agents will learn to support the security of the company through prevention, awareness, reporting, and responsible incident management. Each department's agents will learn their badge permissions and what it permits within each color-coded area of the facility.

EC Developments distributes cannabis products, which are controlled substances with many incentives for diversion. Diversions include, but are not limited to, employee or third-party theft or transfer of cannabis products by an employee to an unqualified individual. Therefore, supply chain security is a top priority at EC Developments' facility and a primary job duty for all employees and managers. Best practice dictates that EC Developments demonstrates control and security over its controlled substance inventory.

An employee who is discovered to have a history of theft or diversion based on their background check will not be granted employment. EC Developments will not employ anyone who would come into contact with or handle cannabis who has been convicted of a felony of sale or possession of drugs, narcotics, or controlled substances.

Specific considerations regarding anti-diversion are contained throughout EC Developments' policies and include methods for data collection and employee accountability achieved through training and strict protocols for identifying, recording, and reporting diversion, theft, or loss. Access to cultivation areas is restricted to employees and escorted visitors only. Access to each separate functional area is granted to an employee based on her or his experience, tenure, and level of responsibility.

Extensive training of employees will ensure that all staff are informed of security and anti-diversion measures, and properly trained to comply with all the policies and procedures. EC Developments' employees track all plant material from propagation to distribution as cannabis products. To accomplish this segment of training, agents will participate in an in-classroom education session led by EC Developments' Security Officer. The Security Officer will provide education on topics, such as opening and closing procedures; the location of silent alarms; all areas of ingress and egress; fire emergency protocols; robbery and theft protocols; data security best practices; and the location of all emergency contacts, including phone numbers for the alarm company, surveillance company, fire department, police department, spill response team, poison control center, and the Commission.

More importantly, employees will understand the rules regarding transfers of cannabis between operational units. Transfers must specifically be:

- Approved by a Director-Level Employee;
- Fully documented in the METRC Inventory Control System;
- Recorded under camera surveillance;
- Limited to internal cultivation units;
- No usable plant materials or extracted materials may ever leave EC Developments' cultivation facilities; and
- Cannabis and cannabis products will NEVER be dispensed at the company's cultivation facilities.

From a safety perspective, it is important that employees are taught to follow basic hygienic protocols in order to prevent the spread of contagious diseases in the workplace. In order to create fully effective health and safety procedures, training must be provided through both initial employee training and followed by regular refresher courses. Any updates to protocols will be quickly and clearly communicated with additional training as necessary. Contagious disease prevention training will be provided to employees in the following areas:

- Sanitation of surfaces and equipment;
- Workplace and physical safety, including proper ventilation and SOPs for the use of cleaning materials;
- The wearing of masks and Personal Protective Equipment (PPE);
- Personal hygiene, including hand washing and laundry;
- Employee interactions when social distancing guidelines are implemented at the state or local level; and
- Proper signage in the facility.

The first step in any Site Safety Program is the development of Human Resources Policies and Procedures that result in the best qualified candidates being hired for the job.

(i) Emergency Preparation

The CM will post and maintain an emergency contact list in several areas of the facility. All cultivation employees will be properly trained in department-specific Incident Response. Material Safety Data Sheets (MSDS) for all chemicals used in the cultivation facility will be organized, accessible to all cultivation employees, and placed conspicuously and available for review by any employee or official visitor.

(ii) Fire Safety

Flammable materials will be stored in a fire locker and properly labeled for first responder identification. All areas of egress will be properly signed in accordance with National Fire

Protection Association (NFPA) 704 standards. EC Developments' facility will comply with all local fire codes. Fire extinguishers will be maintained annually.

(iii) Personal Protective Equipment (PPE)

The CM will implement and maintain the PPE program. The program will be compliant with Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) guidelines and address:

- Hazards present;
- Selection, maintenance, and use of PPE;
- Training; and
- Monitoring.

Cultivation employees will be provided appropriate PPE and training, and will be trained in decontamination procedures. Employees are required to wear protective clothing and equipment as indicated by their department's safe work procedures. These procedures will specifically indicate when, where, and what types of equipment are to be worn. The CM will perform risk assessments of all activities. The assessment will evaluate the types of equipment and clothing that protect against damage to eyesight or hearing, dust or chemical inhalation or ingestion, skin or bodily exposure to caustic or toxic chemicals, and falling objects. Standard PPE required for all cultivation employees includes:

- Accessible eye wash stations with sufficient quantities of portable water;
- Uniforms with some level of fire resistance;
- Chemical-resistant gloves;
- Boots with water resistance and slip protection;
- N-95 or P-100 disposable respirators;
- A full-face air-purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional (required for employees with beards and those performing substance spray applications); and
- Tyvek coveralls for employees performing substance spray applications.

(iv) Chemical Spill Response

All cultivation employees will be appropriately trained on spill response. Every employee is responsible for participating in spill response activities. A fully stocked spill kit will be maintained in the cultivation facilities. Areas with high spill risk will be stocked with a mobile spill kit for immediate mitigation.

(v) Workplace Safety

Site Operations Managers will include workplace safety training for new employees with annual updates. Employees will receive mandated annual Worker Protection Training. This general safety training will include a review of the following:

1. Personal accident reporting and investigations policies;
2. Fire prevention and response plans;
3. Respirator protection;
4. Federal worker protection;
5. Emergency evacuation plans;
6. Material handling and hazard communications policies, including maintenance of SDS;
7. PPE policies; and
8. Emergency contacts.

(f) Inventory Management and Recordkeeping (4 hours)

EC Developments will train agents on the importance of compliance with the Commission's rules regarding inventory management and recordkeeping. EC Developments' Chief Compliance Officer (CCO), COO, and Inventory Manager will train agents on the use of its inventory management (seed-to-sale or S2S) system. During this course, agents will learn to thoroughly detail cannabis and cannabis products throughout their life in the facility. This also includes reviewing products that are shipped using shipping manifests and the company's robust enterprise management system, thoroughly documenting product details in the inventory system, the safe and secure storage of cannabis and currency, and inventory audits.

(g) Inventory Tracking System (7 hours)

A S2S allows employees the ability to efficiently ensure the initial comprehensive inventory of all cannabis plants, including the seeds, parts of plants, and extracts at the facility. The system will include the date the inventory count was taken; the product types and quantity; a summary of the inventory findings; and the name, signature, and title of the employee who conducted the inventory.

In instances of recall and/or waste disposal, the employee overseeing quarantine and destruction can easily create a record within the system detailing any returned and/or waste cannabis product; its destruction; the date of disposition; the company's name; the kind and quantity of cannabis product disposed of; and the method of disposal.

As part of its onboarding process, EC Developments will train its agents to effectively operate its inventory tracking system. Agents will first learn the system through written materials and the inventory tracking system's company-provided training, followed by in-person training on the systems with the department manager. All updates to the system, as well as ongoing refresher courses, will be provided regularly by the CM. An agent who fails to complete any critical training will be denied an agent identification card.

Cultivation agents will learn the inventory tracking system where they will thoroughly detail cannabis, in-production materials, and final products throughout their lifespan in the cultivation

facility. Major topics to learn include the process of compliantly handling inventory en route to the cultivation laboratory, safely and securely storing cannabis, and understanding how inventory audits will be performed.

Agents with permission to oversee transport to other licensed facilities for wholesale will learn how to properly review and update shipping manifests, thoroughly document product details in the inventory system, and securely handle cannabis being transferred to and from storage and the delivery vehicles.

(i) Recall, Quarantine, and Destruction (3 hours)

EC Developments' QAM will provide all-agent training on the meticulous process in handling recalls, quarantines, and destruction of cannabis. The QAM will provide in-class training to educate agents on EC Developments' responsibility to quarantine and dispose of cannabis in a manner that protects the sanitation of the facility; maintains the security procedures; and provides traceability through documentation, reporting, and electronic tracking. Agents will learn to use the Waste Disposal Log to provide thorough documentation of the disposal process, including the number of products, date of disposal, method of disposal, and agent identification. Agents will go through mock recall drills to determine whether their performance of a withdrawal and recall procedure resulted in the proper identification and control of a batch of potentially affected product and whether the agents proficiently performed all steps in the process. After running through these drills, the QAM will determine if the agents are ready to graduate from this program and move on to the company's Employment Practices Training.

(j) EC Developments' Employment Practices (2 hours)

EC Developments is committed to the highest standards of business conduct. Therefore, all employees, officers, directors, and business partners must be committed to the company Code of Conduct (Code) while performing their jobs for the company. EC Developments values honest and ethical conduct and behavior. An employee should personally observe high standards of conduct so that the integrity of the company is preserved.

(i) Ethical Framework

The framework of this Code is based on ethics and EC Developments' deep regard for a culture of integrity. EC Developments commits to honest and ethical conduct; using good judgement; taking responsibility for any mistakes and ensuring that these are corrected or addressed; avoiding actual or potential conflicts of interest, as well as the appearance of conflicts of interest; full, fair, accurate, timely, and understandable financial disclosure in reports and documents; and compliance with any and all applicable laws, rules, and regulations.

(ii) Discipline

Failure to adhere to this Code may constitute grounds for disciplinary action for misconduct up to and including termination. Violations include failing to adhere to the provisions of the Code; failing to promptly report a suspected violation of the Code; encouraging another to commit a violation of the Code; retaliating against another employee for reporting a concern; and failing to implement the provisions of the Code according to one's role and responsibilities. In addition, any deviation from performance standards or internal policies may result in disciplinary action.

(iii) Employee Rights and Communications

Employee rights and labor relations is a key focus of EC Developments, particularly due to its leadership team's extensive experience in overseeing employees. EC Developments' Code in no way prohibits, limits, or restricts employees from exercising any rights provided by law, including, but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act (NLRA). This includes, but is not limited to, the right of employees to speak with others about the terms and conditions of their employment, appropriately bargain where necessary, and engage in specific activities for the purpose of mutual aid and protection. Select employees appointed by the group will represent the majority in all bargaining and representation matters. EC Developments will not discriminate against any employee or potential employee in regards to membership status or potential membership status. Additionally, EC Developments will never interfere with the administration, or attempt to assist or control union activities, but will participate in collective bargaining with employee representatives in order to ensure the Act is being utilized appropriately for its intended purpose. EC Developments commits to protect and respect the privacy of its employees, clients, suppliers, and contractors. In addition, the company commits to compliance with all applicable privacy laws. Employees have the right to be free from retaliation and should receive support when taking any actions in furtherance of this Code's provisions.

(iv) Employer and Employee Responsibilities

Fair Employment Practices: EC Developments values a culture of diversity, inclusion, dignity, and respect, and commits to providing an environment free of discrimination, harassment, and retaliation. In addition, the company commits to complying with all applicable labor and employment rules and regulations at the federal, state, and municipal level. The company prohibits any unlawful behavior, including discrimination, harassment, or retaliatory conduct, on the part of its employees, officers, directors, or business partners.

Health and Safety: EC Developments commits to providing a safe and healthy workplace for all of its employees. The company will provide leadership and resources to employees in order to prevent hazards of any kind in the workplace. In addition, the company commits to engaging in practices that will contribute to the health and safety of the community in which the business operates.

Employees acknowledge that it is their responsibility to read, understand, and comply with the Code and to implement EC Developments' vision of an honest and ethical workplace with a culture of integrity. All employees have a responsibility to report potential violations of the Code in good faith. In addition, employees should communicate any relevant suggestions, including ways that processes may be improved; ethical issues that may be emerging and need to be included; and possible additions to the Code based on factors such as business development or organizational change.

(k) Demonstration of Knowledge and Training

As seen above, agent onboarding is an extensive and exhaustive program that ensures complete understanding of cultivation facility operating procedures. Company agents will undergo training regarding the Commission's regulations and all other applicable laws and regulations. After they complete each portion of EC Developments' Onboarding Training, agents will take an exam to demonstrate their understanding of the topics presented. No agent will be permitted to engage with cannabis or perform her or his job duties until she or he has passed this exam to the satisfaction of the manager leading the course.

If a staff member fails the exam, she or he will repeat the relevant module or do on-the-job training pertaining to the portions answered incorrectly. If job performance is unsatisfactory after foundational training, staff will be given additional training and instruction. If performance does not improve within 14 days, the staff member may be written up for poor job performance. All training will be completed through the company's Human Resources Information System (HRIS), which tracks staff training and exam results. The HRIS retains electronic records of all training and attendance records for at least three years, which will be available to the Commission upon request. Compliant to these records will include:

- The name of the person receiving the training;
- The date(s) of the training;
- A general description of the topics covered;
- The name of the person supervising the training; and
- The signatures of the person receiving the training and the individuals providing the training.

EC Developments will keep a copy of the certificates of completion for each employee's training on file and make them readily available for inspection. When a change of EC Developments' management occurs, the new manager will review the training record and sign it, indicating that the new manager understands its contents.

To maintain ongoing facility compliance after agents complete their Onboarding Training, managers will complete regular audits and reviews of agents. Agents are required to notify their

supervisor if they ever have a question, and the supervisor is required to provide an answer in a timely fashion.

Once recruitment assumes a regular pace, Onboarding Training will occur during the first week of each quarter. EC Developments will allow flexibility for part-time employees who cannot commit to 45 hours of training in a single week to complete the Onboarding Training over a two-week period. Onboarding Training will first be provided to directors, supervisors, and managers so they are equipped to train additional staff members. Onboarding Training will cover the material detailed below. An employee who fails to complete any critical training or violates the Act will be denied a position at the company.

(l) Continuing/Ongoing Education

(i) Education on the Local, State, and Federal Laws Surrounding Cannabis

In compliance with 935 CMR 500.105(2), all employees are required to maintain current knowledge of all applicable state and local laws, as well as documentation processes in accordance with the Commission. EC Developments understands that the legal landscape is ever-changing and broad in scope. EC Developments will ensure its agents learn and receive up-to-date education on laws, including, but not limited to, prohibitions of sales to minors, acceptable forms of identification, driving while under the influence, and cannabis use in public.

To provide ongoing understanding of the cannabis industry's dynamic regulatory landscape, the CEO, COO, and CM will host all-staff meetings at least once per month in order to review any changes to rules and laws affecting the cannabis industry, regulatory updates from the State, changes to rules from the surrounding localities, and updates to processes and procedures. Signs will be posted in the breakroom in a conspicuous location to remind agents of the upcoming meetings. To ensure awareness of significant modifications to rules and regulations, the department managers will provide quizzes to all staff members following the meeting. These quizzes will verify that staff members acknowledge and understand, and will thus, comply with the updated rules.

In order for all EC Developments staff to accurately produce unadulterated cannabis, they must also have a clear understanding of activities and conduct that would undermine this very objective. EC Developments will implement a policy that prohibits the conduct described here.

EC Developments will never:

1. Produce marijuana products in any place except the approved facility at the address of record on the application of its permit;
2. Sell, deliver, transport, or distribute marijuana to any other facility, except for the wholesale distribution of cannabis products between themselves and other authorized processors;
3. Produce or cultivate marijuana products for use outside Massachusetts;



4. Provide marijuana product samples;
5. Permit consumption of marijuana products on the property;
6. Operate or open unless a manager is on the premises and is directly supervising the activity within the facility. At all other times, EC Developments will be closed and properly secured;
7. Permit any person on its premises except its employees, qualified visitors, registered agents, or laboratory staff needing to collect marijuana samples for testing on its premises.
8. Permit the fraudulent use of a source of identification;
9. Allow access to any facility areas without proper identification;
10. Fail to designate with a sign all limited and restricted access areas;
11. Display signage that has not been approved by the Commission;
12. Employ a person under 21 years of age; or
13. Permit any agent or employee to participate in any of the above statements.

(ii) Ongoing Training and Refresher Courses

As seen above, the agent onboarding process is an extensive and exhaustive effort to ensure complete understanding of facility operating procedures. After training has been completed and the COO and department manager determine that the employee is sufficiently prepared to begin working within her or his operations, the employee will be permitted to work on-site. Employees will receive ongoing training in all new updates concerning cannabis. EC Developments will maintain an on-site training curriculum for employees to reference at any time.

However, EC Developments' training does not end here. All owners, managers, employees, and agents will be required, as a condition of employment, to participate in annual training on updates to the inventory tracking system, quarantine protocols, recordkeeping, etc. Agents will attend refresher courses and demonstrate their understanding of updates. To maintain ongoing facility compliance, managers will complete regular audits and reviews of agents. These reviews will be conducted through unannounced walk-throughs by a supervisor with an agent during her or his shift.

The purpose of this professional development stage is to provide continuing education and training to employees, as well as for enacting new procedures, changes in rules and regulations, and innovations in science and technology. EC Developments will evolve with the industry, embracing new technologies and processes that increase efficiency. The COO will coordinate with managers to oversee employees' professional development and where necessary, determine if a promotion, raise, demotion, or termination is warranted.

Every three months, department managers will evaluate employee performance. A written performance evaluation is performed annually. The results will be reported to the manager on

duty. When necessary, the CEO, COO, and CFO will be consulted to decide if a promotion, raise, demotion, or termination is warranted. Re-training will be used as needed to address any deficient performance.

Hands-on instructional training is used to address any problems in technique or method. Memos and updated policies and procedures will be used to communicate changes in regulations, SOPs, or business policies. Department meetings ensure all employees remain aware of operational changes. Third-party trainers and subject matter experts may be retained, as needed, for professional development activities. Each department will hold team meetings on a weekly basis. All EC Developments team members will meet quarterly, at least, as a group to address company-wide issues and events.

### (iii) Post-Training Feedback

To maintain EC Developments' high standards of quality, efficiency, and compliance, the COO will evaluate the training program and employee results monthly. The COO will solicit and record feedback on the quality and efficacy of a training module from employees who received the training. Feedback will be solicited utilizing post-training group discussions, individual interviews, and anonymous surveys. Based on the results of this evaluation, the COO, in partnership with the managers, will implement any necessary changes and determine the need for re-training of staff.

EC Developments has planned a thorough onboarding and ongoing training process, and believes that implementation will procure the best, highest quality agents possible. EC Developments stands by its philosophy of compliance, which drives the educational processes open to all agents. Agents will have working knowledge of EC Developments' replicable, reliable SOPs. EC Developments is confident that it will sustain a safe, productive, and compliant work environment through its training company SOPs; safety and security equipment and protocol; inventory system training and management; recall, quarantine, and destruction; and employment protocols. Through its rigorous program comprising in-class training, question-and-answer sessions, quizzes, and performance evaluations, EC Developments is also confident its company will not only meet, but exceed all regulatory requirements surrounding agent training.

## 2. Anticipated Positions

### **CCO-Chief Compliance Officer**

Autonomous position reporting directly to the CEO. CCO ensures that protocols comply with the Commission and other regulatory agencies; drafts and monitors all compliance procedures; possesses excellent analytical skills, including the ability to comprehend complex legislation and anticipate its implications on operations; and has strong communication skills that sustain dialogue and relationships with the Commission's officials, law enforcement, landlords, city personnel, and management.

**CEO-Chief Executive Officer**

Direct experience managing a business, cannabis facility, or healthcare facility, preferably with a regulatory component; is analytically and socially intelligent; is able to take responsibility for EC Developments, while maintaining a solution-oriented, vision-based attitude; possesses legal and financial knowledge; is able to simultaneously focus on short-term and long-term goals; and possesses the ability to identify and respond to problems quickly and appropriately.

**CFO-Chief Financial Officer**

Manages the financial actions of the company; tracks cash flow; organizes financial planning; and analyzes the company's financial strengths and weaknesses, and proposes corrective actions accordingly.

**COO-Chief Operating Officer**

Continually reconciles and monitors cannabis inventory to maintain full compliance with the Commission's regulations; maintains communication with all state and local law enforcement and regulatory agencies to ensure consistent material compliance; possesses extensive knowledge of regulations and continual compliance training; and maintains relationships with local municipalities and enforcement.

**CSO-Chief Strategy Officer OR Compliance Manager**

Assists the CEO with developing, communicating, executing, and sustaining corporate strategic initiatives; creates and executes strategies for both the short term and the long term; and works closely with other executives to align all of EC Developments' goals and initiatives.

**Human Resources Manager**

Supports the efforts of the company in recruiting and employing EC Developments' robust and diverse staff. The HRM also carries out the ongoing efforts of the company to ensure policies and procedures are provided to every agent of the company, and that agents have the ability to communicate any instances of malfeasance.

**Inventory Control Manager**

Manages day-to-day inventory operations in accordance with state and local laws; schedules and delegates maintenance of storage areas; orders and receives inventory, products, and deliveries; and maintains facility compliance and cleanliness.

**Marketing Manager**

Delegates marketing tasks to the marketing team, when applicable; communicates, delivers, and exchanges offerings that have value for business partners; engages in vision casting and strategic planning; manages marketing budgets; and analyzes results of marketing strategies.

### **Process Review and Inspection Manager**

Manages and directly oversees incoming inspection activities; reviews processes and procedures in accordance with company standards; reviews and assesses corrective and preventative action plans according to specified timelines to resolve audit findings and prevent recurrence; participates in planning and development of production schedules; and communicates and coordinates with others to maximize the effectiveness and efficiency of interdepartmental operations and activities.

### **QAM-Quality Assurance Manager**

Responsible for the quality and compliance of cannabis product within the retail facility. The QAM will develop, implement, and update quality assurance policies and SOPs to reflect all applicable federal, state, country, and municipal laws, regulations, and ordinances. The QAM will also implement, maintain, and update sanitation and quality control practices to ensure the safety and quality of cannabis at the retail facility. The QAM will perform or oversee routine audits of compliance processes and participate in state regulatory compliance inspections.; The QAM will provide training and consistent communication and messaging to all employees.; The QAM willand review all concerns and complaints regarding any cannabis product complaint that has been purchased from the retail facility, and respond immediately, according to protocol.

### **Cultivation Manager**

Ensures that the members of the company, management, and employees are in compliance with the rules and regulations of regulatory agencies; that company policies and procedures are being followed; and that behavior in the organization meets the company standards. The Cultivation Manager oversees the operation of all licensed cultivation locations, contractors, managers, and agents. The CEO delegates responsibility for management and day-to-day operations to the Cultivation Manager, and he or she has the authority to carry out these responsibilities, in accordance with the direction and policies established by the members of the company. The Cultivation Manager provides the direction and means to the members of the company as they carry out their governance functions.

### **Cultivation Agents (4-6)**

Responsible for carrying out the day-to-day operations in the cultivation facility. Including executing grow schedules, trimming plants, ensuring clean rooms, etc.

### **Security Officer (can be outsourced)**

Possesses the ability to develop and manage security protocols in accordance with company policies; is capable of identifying and responding to breaches in security and/or dangerous situations; has knowledge of cannabis policy and law; and provides security for transportation activities.

### **Security Personnel**

This staff ensures that the facility is secure on the outside, as well as on and the inside. This staff will be responsible for monitoring and regulating security equipment to ensure optimal functioning, and will review information from in this equipment if/when a breach has been detected. The Security Personnel will be responsible for ongoing surveillance.

### **Inventory Specialist**

Oversees the inventory within and shipping to/from the retail facility. Counts all store products and supplies; analyzes sales records and compares them to physical store inventory. Reports and discrepancies to the GM and other management personnel. Maintains cleanliness and organization of the stockroom. Works with the QAM in instances of recalls and waste. Oversees deliveries and shipments of products, inventory audits, opening and closing inventory procedures, and the organization and rotation of products.

### **IT Manager**

Will formulate best practices for cyber security in a highly regulated industry, specifically cannabis, and will be proficient in problem-solving, computer literacy, troubleshooting, and familiarity with current market solutions for data safety and security.

### **IT support**

The IT support staff will report to the IT Manager. This staff will be proficient in problem-solving, computer literacy, troubleshooting, and familiarity with current market solutions for data safety and security. This staff will ensure that all computer systems required for daily function within the company are functioning at optimal capacity.

### **Maintenance**

Perform general maintenance and repairs for assigned equipment and facilities that do not require a specialized technician, which may include plumbing, electrical work, basic carpentry, heating and cooling, and other building systems; inspect and identify equipment in need of repair; troubleshoot issues to determine necessary repairs; plan repair work using building blueprints or the equipment manual, as necessary; perform routine maintenance on building systems; order supplies and materials needed for repairs and maintenance; assist with upkeep of the retail facility; and strictly adhere strictly to EC Developments' policies and Occupational Safety and Health Administration (OSHA) regulations regarding health and safety.

## **DIVERSITY PLAN**

EC Developments has identified 6 segments of diverse populations: (1) women; (2) minorities; (3) veterans; (4) persons with disabilities; and (5) LGBTQ+.

When analyzing this breakdown against local demographics, EC Developments has identified the following Diversity Plan Goals:

- Hiring of staff that ensures a 10% minimum hiring of women;
- Hiring of staff that ensures a 10% minimum hiring of minorities;
- Hiring of staff that ensures a 5% minimum hiring of individuals with disabilities;
- Hiring of staff that ensures a 5% minimum hiring of individuals that identify as LGBTQ+;
- Hiring of staff that ensures a 10% minimum hiring of military veterans; and
- Ensuring that a minimum of 15% of third-party ancillary businesses used by EC Developments to support its operations, are women-owned, minority-owned, individuals with disabilities-owned, LGBTQ+-owned, and veteran-owned, according to the Massachusetts Supplier Diversity Office, broken down as follows:
  - At minimum, 5% women-owned businesses;
  - At minimum, 2% veteran-owned businesses;
  - At minimum, 5% minority-owned businesses;
  - At minimum, 2% LGBTQ+-owned businesses; and
  - At minimum, 1% persons with disabilities-owned businesses.

To meet these goals, EC Developments has established the following milestones and programs:

- EC Developments will recruit diverse employee candidates from local job fairs and job boards. EC Developments will also post to and recruit from job boards such as MPNDiversityJobs.com, ThePartnershipInc.org, Diversity-Jobs.com, and MassachusettsDiversity.com. Its advertisement will explicitly state that it is looking for women, minorities, and persons with disabilities to work for the establishment.
- EC Developments will also utilize the Operational Services Division of the Supplier Diversity Office of Massachusetts (OSD) ([sdo.osd.state.ma.us](http://sdo.osd.state.ma.us)) to send out requests for proposals (RFPs) to minority, women, disabled, and veteran business enterprises within its first year of operation for support in its buildout. Thereafter, EC Developments expects to utilize this portal at least once a year, depending on the need of the company for third-party business support.
- EC Developments will promote the opening of positions through local job fairs and job boards. The company will attend local job fairs at least one time per year.
- EC Developments will train management through its onboarding process, ensuring that all company hiring is nondiscriminatory and inclusive.

- As part of its goals, EC Developments will ensure that all applicants have a fair opportunity to be considered for employment, and that all hired agents feel represented in their work environment and are not being discriminated against. *See* 935 CMR 500.101(1)(c)(k).

EC Developments will work towards each of its milestones through the following measurements:

- EC Development's Human Resources Manager (HRM) will administer and document all diversity and recruitment initiatives, including ensuring the thorough documentation of its diversity plan.
- The HRM will review all documentation each quarter to measure outcomes and the milestones met or unmet. This review will also measure the steps taken toward each measure so that EC Developments can improve its processes. The HRM will document the jobs listed as available; where the opportunities are advertised (e.g. the websites, recruitment boards, etc.); the number and demographics the individuals target through the recruitment vehicles used; the number and demographics of individuals who submitted resumes, were interviewed, and were hired. Through this documentation process, the HRM will have all counts of the number of individuals hired who are women, minorities, individuals with disabilities, veterans, and other diverse groups. This will be assessed from the total number of individuals hired to ensure at least 10% minorities, women, and disabled individuals, and 10% veterans are hired.
- The HRM will work with local job fair organizations to ensure yearly participation in these fairs. The HRM, in coordination with the CIA Team, will document the number of job fairs in which the company has participated, the targeted demographics who have engaged with the company at the fair, resumes received, resulting interviews, and hiring.
- The HRM will document all responses received through EC Developments Requests for Proposals provided to the OSD, including the type minority status of the companies, their responses, and the companies hired for the product/service requested. It will be measured against all services and products purchased by EC Developments, to work toward at least 5% women-owned businesses; 2% veteran-owned businesses; 5% minority-owned businesses; 2% LGBTQ+-owned businesses; and 1% persons with disabilities-owned businesses.
- In an effort to prevent discriminative occurrences and to foster a workplace of collaboration, EC Developments' HRM will proactively educate all employees, including management, on discrimination issues, the reporting process, and corrective actions. This plan is comprised of trainings, including, but not limited to, family responsibilities training, anti-discrimination, sexual harassment training, and anti-harassment onboarding and yearly training sessions for all employees.
- EC Developments will adhere to the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

- Any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

EC Developments will utilize the above Diversity Plan upon notice of award of a provisional license, and will continue assessing its plan throughout the year to work towards its goals. The Progress and success of this plan will be thoroughly documented, evaluated, and reviewed annually from provisional licensure, upon license renewal and each year thereafter. The Plan will account for demonstration of proof of progress and success upon its yearly license renewal.