



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284579
Original Issued Date: 11/05/2022
Issued Date: 11/05/2022
Expiration Date: 11/05/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Eddie's Flowers, Inc.

Phone Number: 413-883-3471
Email Address: gignation@gmail.com

Business Address 1: 23 Rindge State Rd.
Business City: Ashburnham
Business State: MA
Business Zip Code: 01430
Business Address 2:
Mailing Address 1: 1 Crescent Hill
Mailing City: Springfield
Mailing State: MA
Mailing Zip Code: 01105
Mailing Address 2:

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: 80
Role: Owner / Partner
Percentage Of Control: 80
Other Role:

First Name: Iyad Last Name: Jamal Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Some Other Race or Ethnicity

Specify Race or Ethnicity: Jordanian

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 20 Percentage Of Control: 20

Role: Owner / Partner Other Role: Manager

First Name: David Last Name: Mech Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Iyad Last Name: Jamal Suffix:

Types of Capital: Monetary/Equity, Land, Other Type of Total Value of the Capital Provided: Percentage of Initial Capital:

Buildings Capital: \$100 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 23 Rindge State Rd.

Establishment Address 2:

Establishment City: Ashburnham Establishment Zip Code: 01430

Approximate square footage of the establishment: 600039 How many abutters does this property have?: 42

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Signed Form for Eddie's Flowers.pdf	pdf	6216fb9c32b90c07941a3a10	02/23/2022
Community Outreach	Eddies Flowers outreach 1-25-22(1).pdf	pdf	6216fc43440815076f411d32	02/23/2022

Meeting Documentation				
Community Outreach Meeting Documentation	Eddie's Flowers COM Attendees.pdf	pdf	6216fc5411f5a30789d950fc	02/23/2022
Community Outreach Meeting Documentation	eddies flowers website meeting_compressed(1).pdf	pdf	621702750d00f50776268337	02/23/2022
Plan to Remain Compliant with Local Zoning	eddies flowers PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING.pdf	pdf	62170282e449f407967d7b82	02/23/2022
Community Outreach Meeting Documentation	04.09.20_Form_COM_Attestation filed).pdf	pdf	6269a980560e3c000882cdd4	04/27/2022
Community Outreach Meeting Documentation	eddies flowers notice gardner news .pdf	pdf	6269a9e34d83ec000a38eca2	04/27/2022
Community Outreach Meeting Documentation	eddies flowers notice gardner news exh B.pdf	pdf	6269aa28560e3c000882cf03	04/27/2022
Community Outreach Meeting Documentation	eddies flowers com attendees redact.pdf	pdf	6269aa364d83ec000a38ed30	04/27/2022
Community Outreach Meeting Documentation	eddies com abuttors exhibit c.pdf	pdf	6271bf334d83ec000a3ffe98	05/03/2022

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	eddies positive impact aug 4.pdf	pdf	62ec49141e960b0009f3db9f	08/04/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: lyad

Last Name: Jamal Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: David

Last Name: Mech 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
Bylaws	eddies flowers bylaws.pdf	pdf	6227b3937641f907553ea4a5	03/08/2022
Department of Revenue - Certificate of Good standing	ViewFile(19).pdf	pdf	623d22f253957f0008686048	03/24/2022
Articles of Organization	CorpSearchViewPDF.aspx(1).pdf	pdf	623d2881c91bef0009499b47	03/24/2022
Secretary of Commonwealth - Certificate of Good Standing	22030329180(1).pdf	pdf	623d2912c91bef0009499bcb	03/24/2022
Secretary of Commonwealth - Certificate of Good Standing	unemployment affidavit eddies.pdf	pdf	6269da0d4d83ec000a391f45	04/27/2022

No documents uploaded

Massachusetts Business Identification Number: 001451202

Doing-Business-As Name:

DBA Registration City: Not Applicable

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	liability Insurance.pdf	pdf	623e218bc91bef00094ae381	03/25/2022
Business Plan	Ashburnham Retail Final-July 28plan.pdf	pdf	62e3125ac4bff60009316f37	07/28/2022
Proposed Timeline	Proposed timeline retail July 28, 2022.pdf	pdf	62e31292fad13900086c38c5	07/28/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan For Obtaining Marijuana and Other Products.pdf	pdf	62349aba440815076f419456	03/18/2022
Restricting Access to age 21 and older	Limiting Access To Over 21.pdf	pdf	62349b53177b0107893815d3	03/18/2022
Prevention of diversion	DIVERSION PROTECTION.pdf	pdf	6234a1677641f907553edd2a	03/18/2022
Transportation of marijuana	Transportation of Marijuana and Marijuana Related Products.pdf	pdf	6234a3ca17ef97077a76bd2d	03/18/2022
Security plan	Security Plan gd modified.pdf	pdf	6269e15e560e3c0008830ab4	04/27/2022
Storage of marijuana	Storage of Marijuana in Compliance with 935 CMR 500.pdf	pdf	6269e2d74d83ec000a3925fe	04/27/2022
Energy Compliance Plan	Energy Efficiency and Conservation.pdf	pdf	6269e420560e3c0008830c2a	04/27/2022
Dispensing procedures	Dispensing Procedures.pdf	pdf	6269e53d4d83ec000a3926ca	04/27/2022
Inventory procedures	Inventory Control.pdf	pdf	6269e80a4d83ec000a392730	04/27/2022
Personnel policies including background checks	personnell and background2.pdf	pdf	6269e8ca4d83ec000a392759	04/27/2022

Qualifications and training	Qualification and Traininggd.pdf	pdf	6271c3de4d83ec000a40013b	05/03/2022
Maintaining of financial records	Operating Policies and Proceduresmaintenance financial records.pdf	pdf	62c75b829ff11700082db19e	07/07/2022
Record Keeping procedures	Operating Policies Record Keeping.pdf	pdf	62c75d00f750650008c42499	07/07/2022
Quality control and testing	Quality control july 5.pdf	pdf	62c75db2f750650008c42515	07/07/2022
Diversity plan	Diversity August 4gd.pdf	pdf	62ec496e1e960b0009f3dbfb	08/04/2022

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:30 AM	Monday To: 10:00 PM
Tuesday From: 8:30 AM	Tuesday To: 10:00 PM
Wednesday From: 8:30 AM	Wednesday To: 10:00 PM
Thursday From: 8:30 AM	Thursday To: 11:00 PM
Friday From: 8:30 AM	Friday To: 11:00 PM
Saturday From: 8:30 AM	Saturday To: 11:00 PM

Sunday From: 8:30 AM

Sunday To: 10:00 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:

Eddie's Flowers, Inc.

2. Name of applicant's authorized representative:

Iyad Jamal, President

3. Signature of applicant's authorized representative:

4. Name of municipality:

Ashburnham, MA

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

Brian Doherty



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



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

bdoherney@ashburnham-ma.gov

8. Host community agreement execution date:

6/7/2021

LEGAL NOTICE
NOTICE OF COMMUNITY OUTREACH
EDDIE'S FLOWERS, INC.

Ashburnham Community Outreach Meeting Notice & Materials

This Notice is hereby given that Eddie's Flowers, Inc. will hold a Virtual Community Outreach Meeting on **1/25/2022, 5:30 PM** to discuss the proposed site of one or more of the following

Adult-use Marijuana Establishment licenses: Marijuana Cultivator; Marijuana Product Manufacturer and Marijuana Retailer to be located at 23 Rindge State Rd. Ashburnham, MA 01430, in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings, M.G.L. ch. 94G, the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 et seq, and other applicable laws and regulations. The Virtual Community Outreach Meeting via Zoom can be joined by visiting:

Topic: Community Outreach Meeting - Eddies Flowers

Time: Jan 25, 2022 05:30 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/81759054250?pwd=cGJBbkRWdUhDV3VpcXpQeUY1Nnl2dz09>

Meeting ID: 817 5905 4250

Passcode: 241809

One tap mobile

+16465588656,,81759054250#,,, *241809# US (New York)

+13017158592,,81759054250#,,, *241809# US (Washington DC)

Dial by your location

+1 646 558 8656 US (New York)

+1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

+1 669 900 9128 US (San Jose)

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

Meeting ID: 817 5905 4250

Passcode: 241809

Find your local number: <https://us02web.zoom.us/j/kc2lhpu3pq>

Topics to be discussed at the meeting will include, but not be limited to:

- **The types of Adult-Use Marijuana Establishments to be located at the proposed address;**
- **Plans for maintaining a secure facility;**
- **Plans to prevent diversion to minors;**
- **Plans to positively impact the community; and**
- **Plans to ensure the establishment will not constitute a nuisance to the community.**

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance or asked during the meeting and after the presentation. If you have a question you would like to submit in advance, please email info@eddiesflowers.net with the subject line "Ashburnham Outreach Meeting Question Submission" no later than 5:00pm on, **1/25/ 2022**.

A copy of the meeting presentation will be made available at www.eddiesflowers.net, at least 24 hours prior to the meeting. If you are unable to attend this event, but would like to be included on our mailing list that will provide updates about the facility, please send an email to info@eddiesfloweres.net

A copy of this notice is on file with the Town Clerk at Ashburnham MA Town Hall, 32 Main St. Ashburnham, MA 01430 and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment and residents within three hundred feet of the property line of the Marijuana Establishment as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.

Notice

Community Outreach Meeting

January 25, 2022

ZOOM MEETING

5:30 PM

David Mech, of Eddie's Flowers LLC. in coordination with the Town of Ashburnham will hold a Zoom Community Outreach meeting as required under CMR 500.101 for a proposed marijuana retail/manufacturing/cultivation site on Wednesday January 25th at 5:30 PM via Zoom use link on mytowngovernment.org/01430.

The proposed facility will be located at 23 Rindge State Road / (Map 71 Parcel 21)

This is open for public to ask questions please log in at designated time.

Abutters

Mailed
~~10/1/21~~

11/10/22

ARO, CRAIG
446 ASHBY RD
ASHBURNHAM, MA 1430

CHARLAND PETER F
45 SOUTH MAIN STREET
PO BOX 215
ASSONET, MA 02702-0215

FINCH DOUGLAS
24 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

BERNARD MATTHEW R
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

COLLAZO RAMON
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

GAUDET MARIE S
492 BILL T DRIVE
READSBORO, VT 5350

BERNARD MATTHEW R
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

COLLAZO RAMON
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1420

GAUDET MARIE S
492 BILL T DRIVE
READSHORO, VT 5350

BESSETTE, GREGORY C.
169 BATHERICK ROAD
WESTMINSTER, MA 1473

COSWELL STEPHEN P
PO BOX 716
ASHBURNHAM, MA 1430

GUZMAN RUDY ALEXANDER
3 PILLSBURY RD
ASHBY, MA 1431

BESSETTE, GREGORY C.
169 BATHERICK ROAD
WESTMINSTER, MA 1473

DAVID BRUCE R
350 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

HANCOCK JAMES D
9 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

BRESLIN TODD M
36 WATATIC POND RD
ASHBURNHAM, MA 1430

DESIGN WITH NATURE INC
PO BOX 451
BARRE, MA 01005-0451

HINES JOSEPH B
26 WATATIC POND RD
ASHBURNHAM, MA 1430

BRYANT RAYMOND
39 WATATIC POND ROAD
ASHBURNHAM, MA 1430

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

HINES PATRICK, DANIEL, JO
26 WATATIC POND RD
ASHBURNHAM, MA 1430

CALLAHAN JUSTIN
4 HARDY RD
ASHBURNHAM, MA 1430

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

HOLMES PAUL R
9 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

CARBONE, CHRISTOPHER
240 WESTMINSTER HILL RD
FITCHBURG, MA 1420

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

JAMIESON DEBRA A (FKA LAR
7 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

CARBONE, CHRISTOPHER
14 WATATIC POND RD
ASHBURNHAM, MA 1430

FICHTEL ANDREW W
344 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

LEHTONEN ANGEL M
4 LITTLE WATATIC POND RD
PO BOX 1018
ASHBURNHAM, MA 01430-1018

LEHTONEN ANGELA MAY
PO BOX 1018
ASHBURNHAM, MA 1430

VERRECCHIA BETTY J
8 WATATIC POND ROAD
ASHBURNHAM, MA 1430

MACNEIL ANDREW J
5 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

WELCH JAMES F
168 MT VERNON ST
FITCHBURG, MA 1420

MURRAY TIMOTHY D
14 RINDGE STATE ROAD
PO BOX 837
ASHBURNHAM, MA 01430-0837

NOLAN KIM E
352 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

OJALA CHRISTOPHER S
P O BOX 219
ASHBY, MA 1431

RICKHEIT HANS
25 WATATIC POND RD
PO BOX 7
ASHBURNHAM, MA 1430

ROY RICHARD A
465 ASHBY ROAD
ASHBURNHAM, MA 1430

SHELL CARL W
11 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

SMITH, LYNDIA
40 WATATIC POND RD
ASHBURNHAM, MA 1430

TOWN OF ASHBURNHAM
32 MAIN STREET
ASHBURNHAM, MA 1430

**Eddie's Flowers
Community Outreach Meeting
January 25, 2022**

Attendees

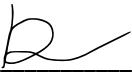
1. Laureen Shell 352 Rindge State Rd., Ashburnham, MA

Laureen inquired as to the water usage (adequacy) She was shown the Engineer Report, and the water capacity was discussed. She also had concerns with runoff into neighboring pond, which we said we would look at remedies to stop said runoff, as part of our Community Impact concerns. Laureen also was concerned about the fit of the project in the neighborhood. We assured her we would have a good footprint and will be an asset to the town.

2. Maureen and Steve Coswell, 17 Watatic Pond Rd., Ashburnham, MA

The Coswells had questions regarding the cultivation, placement and size, along with water use and number of crops. We explained we were still looking into the best fit for the property and neighborhood.

Dated: February 23, 2022



David A. Mech, Secretary
Eddie's Flowers, Inc.

Community Outreach Meeting
Eddie's Flowers, Inc.
23 Rindge State Rd. Ashburnham MA
January 25, 2022

Meeting Materials

- The type(s) of Adult-use Marijuana Establishment to be located at the proposed address;
- Information adequate to demonstrate that the Adult-use Marijuana Establishment location will be maintained securely;
- Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;
- A plan by the Marijuana Establishment to positively impact the community; and
- Information adequate to demonstrate that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, or other conditions likely to cause nuisance.

Marijuana Review Team Application Cannabis Cultivation Facility 23 Rindge State Road, Ashburnham, MA



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
Fax: (413) 732-4206
gignation@gmail.com

Introduction

Eddie's Flowers, Inc. ("Eddie's Flowers, Inc.") is a Massachusetts corporation requesting consideration to enter into a Host Community Agreement with the Town of Ashburnham, MA. Eddie's Flowers, Inc. desires to execute a Host Community Agreement for the development, construction and operation of a Marijuana Establishment within the Town, in accordance with applicable laws and regulations (935 CMR 500.101). Eddie's Flowers, Inc. will operate an establishment at 23 Rindge St. Rd., in Ashburnham, Massachusetts in a professional, efficient, and conscientious manner consistent with the stated goals of the town, and in full compliance with the regulations as promulgated by the Commonwealth of Massachusetts.

Eddie's Flowers, Inc. is proposing to create 25 new jobs for qualified Ashburnham residents as a result of its anticipated operation. Eddie's Flowers, Inc. is committed that our staff will be as diverse as our city. It is in the best interest of the town and the surrounding neighborhood to grant this license to secure the tax revenue remains local.

Eddie's Flowers, Inc. is a Springfield Massachusetts based company. Its officers and directors include minorities, and residents of disproportionately impacted neighborhoods.

As a local business, its shareholders strive to become leaders within the community and creating a positive impact. All those affiliated with Eddie's Flowers, Inc. are dedicated to creating a revolutionary, state of the art cannabis facility while striving to create a positive change to the neighborhood and the citizens of Ashburnham.

Eddie's Flowers, Inc. is proposing a fully integrated retail, manufacturing, and cultivation operation at one location. The location of this operation is adequate to accommodate such a facility in that it contains sufficient space for all operations without creating a detrimental impact to the immediate community. This proposal is an innovative approach to mitigate the epidemic of vacant storefronts and distressed properties.

Thank you for the opportunity to present this proposal and for your consideration in advance. Eddie's Flowers, Inc. looks forward to working with the Town of Ashburnham and its residents.

Sincerely,

/David A. Mech/

David A Mech, Esq

Project Description

The Property

This beautiful Post and Beam commercial building located is on the corner of Route 119 and Route 101 in Ashburnham, MA. This young building offers an open concept first floor creating endless opportunities for a modern and effective Retail Marijuana Establishment. There are two handicap bathrooms and a kitchen area, which will be used in our Manufacturing of Cannabis products.. The second floor is an expansive finished office area with separate heat source, full bathroom and separate storage area. We intend to use a portion of the second floor for our manufacturing operation, a separate application for Manufacturing is to be submitted, along with one for Cultivation. The property is equipped with public water supply, and the septic system has been overbuilt, allowing for more than enough capacity for all operations. Commercial zoning allows for the Adult Use Retail business at this location, which is close to the NH line. We intend to Cultivate approximately 7,500 sq. ft. of Canopy, in a 10,000 sq. ft. Greenhouse in the rear of the property.

Operations Plan

People

Iyad Jamal, President
576 Main St.
Somers, CT 06071

Iyad, “Eddie” Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and “long, long, hours”, Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, “Bogeys” which also includes the sale of CBD products. The CBD industry is no different than the “Adult Use” Marijuana industry, in that, both are licensed through the Commonwealth of

Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the “flower”. CBD contains less than .03 percent THC, and therefore is not **FEDERALLY** prohibited.

In Sum, under the direction of Eddie Jamal, Eddie’s Flowers will help make Ashburnham, MA, the Massachusetts “Success Story”.

David A. Mech, Esq., Secretary and General Counsel
1 Crescent Hill
Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie’s Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011 Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in “The Emerald Triangle”.

Mech was also involved in Arizona’s medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona’s Award winning “Level Up” Dispensary.

In 2012 David Mech founded one of the original medical cannabis certification facilities in Massachusetts’ Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept “Coordinated Care” to physicians and encouraging them to work in unison when addressing the needs of “ complex care” patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient’s status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public.

In earlier years, Mech worked for Burns Security for over ten years as a “special operator”, working in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford. Mech has also litigated many establishment negligence cases, including liquor and other major safety violations, and is familiar with current premises security procedures.

Ruben Marques: Director of Manufacturing.

Ruben and his growing CBD company, Erva, is located in Boston's Jamaica Plain section. Jamaica Plain is a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as Follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Director of Cultivation Operations **58 Primrose Street** **Indian Orchard, MA 1161**

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating within the regulatory standards and to develop as a model within the community.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis set forth in Article 17, Sec. 5.20. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior, which is anticipated to cost \$300,000.00. The intent is to construct a retail space contain display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space, which includes its retail space, and a separate Manufacturing facility on the second level.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as Exhibit "E".)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area

with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie’s Flowers, Inc. employees and

management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has

been verified, only then will they have been granted access to the building.
of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur.

Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track daily reimbursements and expenses. The security policies and procedures implemented

at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, patients and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a

failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant

investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc. presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie’s Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie’s Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All

marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Good Neighbor Policy

"As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

"We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come."

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Mall in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of

marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one security guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to threat)
-

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related

records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a

primary and secondary classification are established for incidents involving multiple issues.

- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be firearm and weapon free.

Diversion

Eddie's Flowers, Inc.'s POS System, METRC, will be able to monitor inventory at all times. In addition proper training and constant video surveillance will prevent diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement
- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals

- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks
- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass
- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel

are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

1. discovery of discrepancies identified during inventory;
2. diversion, theft or loss of any marijuana product;
3. any criminal action involving or occurring on or in the Marijuana Establishment premises;
4. any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
5. unauthorized destruction of marijuana;
6. any loss or unauthorized alteration of records related to marijuana;
7. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
8. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
9. any other breach of security.

Eddie’s Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any

corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not 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.

Security Audits

Eddie's Flowers, Inc., on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit must be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Marijuana Establishment must also submit a plan to mitigate those concerns within ten business days of submitting the audit.

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. is submitting the following as (Exhibit "A")

1. Articles of Organization (Enclosed) Newly formed Corp.
2. Bylaws

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis Control Commission it is anticipated that the initial build out will completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 10,000.00 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time, and up to 4 part-time jobs, including at least

10 in the Cultivation process.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, “Eddie’s Flowers, Inc.”, will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers’ needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable “Eddie’s Flowers, Inc.” to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management; we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Cultivation Process

We will use grow bags placed in side-rolling 4 x 8 Ft trays to minimize unproductive walkways thereby increasing the grow area. Soil mixes will be tested for nutrient analysis and safety at the UMass Soil and Plant Tissue Analysis lab. Assuming this analysis is okay then plants will initially be grown from seed in a nursery area as soon as authorized by the Cannabis Control Commission. Organic potting soil or similarly benign and tested potting soil constituted from compost and other commonly used ingredients such as “Promix” which is used to increase media porosity will be used for growing seedlings. The seedlings will be transplanted into the grow bags in each grow room. Later “mother plants” will be used to produce clones from superior plants grown from seed. These mother plants will be maintained in a vegetative growth state for clones to have the best producing genetics and to minimize the purchase of seed which can introduce variability in material grown.

The planned tasks of propagation, growing plants to maturity, and cloning will follow practices that are consistent with The Massachusetts Department of Agricultural Resource (MDAR) guidelines. Staff on site will be trained to adhere to the Cannabis Control Commission regulations as well as adhering to MDAR crop growing criteria. A cultivation plan adhering to the principles of MDAR guidelines will be followed in each cultivation cycle. All operations will be in full compliance with 935 CMR 500.101 (1) (c) for marijuana cultivation.

Before entering the secure cultivation area all workers will pass through a clean room to minimize and hopefully eliminate any pests and diseases. The cultivation area will be monitored daily for crop growth, nutrient and water need by the chief growers (DOC and COO). The plants will be irrigated with a trickle irrigation system designed to reduce water usage, and the system will allow automated fertilization with soluble nutrients. Irrigation water will be drawn from two deep wells on the proposed site. All and individual plants will be incorporated into a computer record complying with any Cannabis Control Commission guidelines from seed or transplant through to maturity and sale to end user Marijuana Establishments (retail and/or manufacturers).

At maturity marijuana plants will be cut and hung to dry then trimmed on two state of the art trimming machines each of different styles that simulate hand trimming with scissors. Once

dried, trimmed and cured the packaged marijuana will be delivered to the end retailer or manufacturer.

Policies and Procedures of Cultivation

The Cultivation wing is meticulously climate controlled differently for each room, determined by order of the Cultivation Director. Vegetative and bloom rooms are also use safe levels of supplemental CO₂; controlled in specific PPM to induce accelerated growth of the plants.

Beginning in our propagation rooms and cared for by our Propagation Teams our seeds will be germinated in either the industry standard of biodynamic grow plugs or Rockwool cubes. Clones will be rooted in Aeroponic cloning machines, which is a bin topped with neoprene discs that are cut to hold a plant cutting, which is sprayed on the cut end from the inside of the bin by drip irrigation sprayers.

Clones are also produced by our Tissue Culture Teams, which grow clones out of plant material in Petri dishes in a lab environment until rooted. The facility also has the option of transferring clones from outside the facility, in batches of a maximum of 100 clones per batch. Once sprouted seeds or rooted clones grow to a height of 8 inches, the plant is given a METRC tag containing a barcode and SKU number to be entered into the system. Any additives used in growing the plants are also entered into the METRC system. Tagged plants are grown to vegetative ready size, depending on the strain, and once at desired height, moved into the vegetative room for further growth.

As they are moved this transition is recorded into the METRC database. Now these clones are inserted into our normal growing systems. Here they are cared for by our Vegetative Teams until reaching the ideal height for flowering, depending on the strain. Plants are pruned as needed before moving into the flower rooms, with weight of waste recorded strain by strain in batches with Data being entered into METRC, Waste is then moved to our Waste Room, to be dealt with later according to state regulations. Once reaching strain appropriate height, our vegetative team records the transfer of the plants into the METRC Database, and the plants are ready to be moved with the net pot they have been grown in, and moved into a similar site in their desired section of the Bloom Room.

Under close care of our Bloom Cultivation Team, our plants are now ready to begin the flowering process. This is induced by adjusting our lighting to an equal split of twelve hours of light and darkness. Now our plants begin to flower for a period that lasts anywhere from roughly 7-12 weeks, (10 on average) depending on the strain before harvest.

Plants are pruned throughout harvest at the discretion/schedule of the Bloom Cultivation Team, and all waste is recorded into METRC and disposed of in the waste room, to again be dealt with according to state regulations. Once each grow supervisor determine that plants are ready for harvest, each plant is cut and weighed wet, with data entered into METRC.

Under supervision of our Dry/Cure team, the plants, separated into batches, can be cut apart, removing the largest stems and remaining fan leaves form small stems to be weighed, with data recorded in METRC to be taken as well to the waste room. The remaining small stems attached to us trimmed flowers are hung in climate-controlled cure/dry room vaults with the rest of their batch until dry enough to trim. Once dry the whole batch is weighed again with data entered into METRC.

The batches are moved to trim rooms and trimmed by our Trimmer Teams overseen by Dry/Cure Assistants, with flowers separated by hand and mechanical trim machines from the trim and remaining stems. Stems are weighed as waste and data put into METRC before going to waste rooms, and flower and trim are weighed and entered into the database as well before being stored separately in our Dry/Cure Vaults.

Batches are then separated into smaller batches to go out to testing. METRC requires that transport route be recorded exactly without deviation to and from the testing facility. Upon returning from the facility the product is now stored in vaults outside of the cultivation wing, to be recorded again into METRC, and is ready to be stored until transfer to retail or wholesale.

Personal Protective Gear (PPE)

All employees will be required to attend OSHA 10 certification classes in order to properly use PPE in our facility.

Based on industry recommendations, including OSHA, we plan on requiring appropriate eye, hand, hearing, respiratory, and ultraviolet radiation personal protective equipment.

Grow light exposure will also mandate use of UV protective glasses meeting requirements of ANSI Z87.1-1989. Protective goggles meeting the same requirements will be required for any nutrient or pesticide mixing, trim machine operators or concentrate extractors.

UV protection beanies, shirts, and facemasks for all Cultivation workers exposed to any grow lights. In areas with possible nutrient or chemical exposure, appropriate use of long sleeve laboratory coats, coveralls, or aprons will be required.

Hand protection will consist of appropriate length nitrile gloves for nutrient mixing, application of chemicals, pesticides, and fungicides. Nitrile gloves are also required for solvent use and any cleaning process. Cut resistant cloves are required for pruning, manual trimming, and automated trim machine operation.

Any personnel exposed to a decibel level deemed hazardous in the facility will be required to use OSHA approved hearing protection (earplugs or earmuffs)

If an exposure assessment determining the need for respiratory PPE beyond a paper face mask, a NOISH certified respirator will be used in context of a written respiratory protection program for medical clearance, fit testing, and proper use and storage.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Cultivation Personnel- In addition to the Cultivation Manager, the cultivation facility will employ sufficient personnel to maintain the growth process.

Security Associate - Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill

the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate it's security efforts with d local law enforcement.

Delivery Plan

Marijuana infused products are delivered in “ready for sale” packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a “just in time” basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie’s Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and by our security services provider and digitally recorded and indexed for review.

Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of

unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie's Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for

staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by 935 CMR 500.000 et seq.

Inventory records as required by

- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained.

These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final

Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

**Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

Diverted marijuana shall be reported to law enforcement officials and to the Commission; or

Engaged in unsafe practices with regard to operation of the Marijuana Establishment, 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 shall be reported to the Commission.

Said employee shall be subject to immediate dismissal for any of the above infractions.

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

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;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids.

Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all

CORI reports obtained.

- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such

waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

- (1) The Marijuana Establishment shall maintain the results of all testing for no less than one year;
- (2) The sale of seeds is not subject to these testing provisions.

- (3) Clones are subject to these testing provisions, but are exempt from testing for metals.
- (4) All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).
- (5) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);
- (6) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and
- (7) No marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) that will demonstrate accessible business hours and safe cultivation conditions;

Personnel policies and procedures; and
All background check reports obtained in accordance with 935 CMR 500.030.

Business records, which shall include manual or computerized records of:

Assets and liabilities;

Monetary transactions;

Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

Sales records including the quantity, form, and cost of marijuana products; and

Salary and wages paid to each employee, 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.

Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.

The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment.
- Plumbing shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and

equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;

We will display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases will be transparent. We will also remove a sample of marijuana from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample unless otherwise authorized herein.

The establishment will post prices in the store and may respond to questions about pricing on the phone.

The Establishment will engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public will include the statement "Please Consume Responsibly," in a

conspicuous manner on the face of the advertisement and shall include a minimum of two of the following warnings in their entirety in a conspicuous manner on the face of the advertisement:

“This product may cause impairment and may be habit forming.”

“Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug.”

“There may be health risks associated with consumption of this product.”

“For use only by adults 21 years of age or older. Keep out of the reach of children.”

“Marijuana should not be used by women who are pregnant or breastfeeding.”

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

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;

- advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;
- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;
- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
- advertising, marketing or branding of marijuana products, on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- signs or other printed matter advertising any brand or kind of marijuana product that are displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale;
- advertising or marketing of the price of marijuana products, except that Eddie’s Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.
5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for

the stop, the duration, the location, and any activities of personnel exiting the vehicle.

12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(b) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(c) Vehicles.

1. A vehicle used for transporting marijuana products must be:

- a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;
- b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);
- c. equipped with an alarm system approved by the Commission; and
- d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

2. Marijuana products must not be visible from outside the vehicle.

3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.

4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.

5. No firearms may be located within the vehicle or on a marijuana establishment agent

(d) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana

products.

2. The storage compartment must be sufficiently secure that it cannot be easily removed.
3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.
4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(e) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
 - d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.
2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.

7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.

8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- a. the originating Marijuana Establishment name, address, and registration number;
- b. the names and registration numbers of the agents who transported the marijuana products;
- c. the name and registration number of the marijuana establishment agent who prepared the manifest;
- d. the destination Marijuana Establishment name, address, and registration number;
- e. a description of the marijuana products being transported, including the weight and form or type of product;
- f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
- g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- j. the weight and inventory before departure and upon receipt;
- k. the date and time that the transported products were re-weighed and re- inventoried;
- l. the name of the marijuana establishment agent at the destination

Marijuana Establishment who re-weighed and re-inventoried products;
and

m. the vehicle make, model, and license plate number.

4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(2) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;

2. Representatives of other state agencies of the Commonwealth; and

3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

(3) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

(a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;

(b) 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;

- (c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volatile Organic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

1. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
2. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing

bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.

3. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.

4. **Our Cultivation building exterior is sealed with an airlock entry**, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

- (1) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.
- (2) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(3) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(4) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(5) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

(1) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.

(2) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

(3) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.

(4) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

Timeline

We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

January 25, 2022 5:30 PM
Zoom

**Marijuana Review Team Application
Cannabis Manufacturing Facility
23 Rindge State Road, Ashburnham, MA**



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
Fax: (413) 732-4206
gignation@gmail.com

Introduction

Eddie's Flowers, Inc. ("Eddie's Flowers, Inc.") is a Massachusetts corporation requesting consideration to enter into a Host Community Agreement with the Town of Ashburnham, MA. Eddie's Flowers, Inc. desires to execute a Host Community Agreement for the development, construction and operation of a Marijuana Establishment within the Town, in accordance with applicable laws and regulations (935 CMR 500.101). Eddie's Flowers, Inc. will operate an establishment at 23 Rindge St. Rd., in Ashburnham, Massachusetts in a professional, efficient, and conscientious manner consistent with the stated goals of the town, and in full compliance with the regulations as promulgated by the Commonwealth of Massachusetts.

Eddie's Flowers, Inc. is proposing to create 25 new jobs for qualified Ashburnham residents as a result of its anticipated operation. Eddie's Flowers, Inc. is committed that our staff will be as diverse as our city. It is in the best interest of the town and the surrounding neighborhood to grant this license to secure the tax revenue remains local.

Eddie's Flowers, Inc. is a Springfield Massachusetts based company. Its officers and directors include minorities, and residents of disproportionately impacted neighborhoods.

As a local business, its shareholders strive to become leaders within the community and creating a positive impact. All those affiliated with Eddie's Flowers, Inc. are dedicated to creating a revolutionary, state of the art cannabis facility while striving to create a positive change to the neighborhood and the citizens of Ashburnham.

Eddie's Flowers, Inc. is proposing a fully integrated retail, manufacturing, and cultivation operation at one location. The location of this operation is adequate to accommodate such a facility in that it contains sufficient space for all operations without creating a detrimental impact to the immediate community. This proposal is an innovative approach to mitigate the epidemic of vacant storefronts and distressed properties.

Thank you for the opportunity to present this proposal and for your consideration in advance. Eddie's Flowers, Inc. looks forward to working with the Town of Ashburnham and its residents.

Sincerely,

/David A. Mech/

David A Mech, Esq.

Manufacturing Operations Plan

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating within the regulatory standards and to develop as a model within the community.

People

Iyad Jamal, President
576 Main St.
Somers, CT 06071

Iyad, "Eddie" Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and "long, long, hours", Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, "Bogeys" which also includes the sale of CBD products. The CBD industry is no different than the "Adult Use" Marijuana industry, in that, both are licensed through the Commonwealth of Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the "flower". CBD contains less than .03 percent THC, and therefore is not **FEDERALLY** prohibited.

In Sum, under the direction of Eddie Jamal, Eddie's Flowers will help make Ashburnham, MA, the Massachusetts "Success Story".

David A. Mech, Esq., Secretary and General Counsel
1 Crescent Hill
Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie's Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011, Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in "The Emerald Triangle".

Mech was also involved in Arizona's medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona's Award winning "Level Up" Dispensary.

In 2012, David Mech founded one of the original medical cannabis certification facilities in Massachusetts' Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept "Coordinated Care" to physicians and encouraging them to work in unison when addressing the needs of "complex care" patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient's status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public.

In earlier years, Mech worked for Burns Security for over ten years as a "special operator", working in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford. Mech has also litigated many establishment negligence cases, including liquor and other major safety violations, and is familiar with current premises security procedures.

Ruben Marques: Director of Manufacturing.

Ruben and his growing CBD company, Erva, is located in Boston's Jamaica Plain section. Jamaica Plain is a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as Follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Cultivation Operations
58 Primrose Street
Indian Orchard, MA 1161

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, the identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis, manufacturing, and cultivation, as set forth in Article 17, Sec. 5.20. et seq. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior, which is anticipated to cost \$300,000.00. The intent is to construct a retail space containing display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space, which includes its retail space, and a separate Manufacturing facility on the second level.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as Exhibit "E".)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will

control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash

and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie's Flowers, Inc. employees and management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, only then will they have been granted access to the building.

of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur.

Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's

Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track daily reimbursements and expenses. The security policies and procedures implemented at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain

operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc. presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie's Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie's Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Good Neighbor Policy

"As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

"We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come."

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that

marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Mall in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one security guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility.

During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to

threat)

-

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed

with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be firearm and weapon free.

Diversion

Eddie's Flowers, Inc.'s POS System, METRC, will be able to monitor inventory at all times. In addition proper training and constant video surveillance will prevent diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement

- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks

- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass
- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

10. discovery of discrepancies identified during inventory;
11. diversion, theft or loss of any marijuana product;
12. any criminal action involving or occurring on or in the Marijuana Establishment premises;
13. any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
14. unauthorized destruction of marijuana;
15. any loss or unauthorized alteration of records related to marijuana;
16. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
17. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
18. any other breach of security.

Eddie's Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not 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.

Security Audits

Eddie's Flowers, Inc., on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit must be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Marijuana Establishment must also submit a plan to mitigate those concerns within ten business days of submitting the audit.

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. is submitting the following as **Exhibit "A"**:

3. Articles of Organization (attached with Bylaws) others to follow,

newly formed corporation.

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis Control Commission it is anticipated that the initial build out will be completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 2500 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time and up to 4 part-time jobs, including at least 8 in the Manufacturing process.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, "Eddie's Flowers, Inc.", will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers' needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable "Eddie's Flowers, Inc." to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management; we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Employees

Our manufacturing facility's employees will consist of one Extraction Supervisor, one Extraction Assistant, one Edible Supervisor and two Edible Assistants

The Extraction Supervisor - oversees all operations in the manufacturing lab to ensure total compliance with all regulations and procedures set forth by the state of Massachusetts and METRC tracking system. Trained in operation of all Extraction equipment in the lab they the manufacturers specifications, the Supervisor will also maintain up to date knowledge on any and all Extraction methods in the industry. Oversees Extraction Assistant in machine operation, METRC tracking, and compliance with any and all state regulations. Works with Quality Control Supervisor to make sure no biomass is contaminated with mold or mildew. Also chooses all state approved packaging for concentrates packages in facility according to company policy and standards of the state.

Extraction Assistant- Assists Supervisor in Extraction Supervisor in operating Extraction equipment and METRC tracking, as well as making sure lab is in compliance with state regulations at all time. Maintains organized sterile laboratory environment in the Extraction lab. Helps Cure/Dry team properly package concentrates before labeling.

Kitchen Supervisor

Oversees edible kitchen and all equipment, products, and all procedures to ensure superior product and total compliance with state regulations and METRC tracking. Designs all cannabis edible products to be produced in kitchen in compliance with sanitation requirements stated in CMR 500.000: "Good Manufacturing Practices for Food, Diseases, Surveillance and Quarantine Requirements" Ensures that no edibles are shaped in any form prohibited by 935 CMR 500.150(1) Also makes sure all edibles produced are packaged in compliance with M.G.L.c 94G, § 4(a1/2)(xxvi) and 935 CMR 500.105(5) and (6). Also ensures compliance with labeling, dosing, and sanitary regulations.

Kitchen Assistants:

Assists Kitchen Manager in ensuring compliance with state regulations and METRC, as well as maintaining a sterile environment in the Kitchen. Works in coordination with DRY/Cure Team to package all products produced in kitchen.

Operations profile: Cannabis trim in our vaults is moved, after cataloging the move into METRC, and brought into the Extraction facility. biomass of cannabis or cbd that may be transferred from any other facility in compliance with state regulations on transfer, testing, and METRC in compliance with 935 CMR 500.105(13), and 935 CMR 50.160.

Once entered into METRC, batches are run loaded into Extraction machines according to manufacturers specifications. Different industry leading extraction machines (distillation, and hydrocarbon extraction) process material into Raw concentrates. Raw concentrates are then refined with vacuum purging in an oven at certain temperature that pulls out remaining

hydrocarbon, a distillation machine and rotary evaporator that separates different cannabinoids and terpenes from any contaminants. Now terpenes and cannabinoids are recombined to specifications determined by Extraction Supervisor for optimum effect and flavor.

Once processed, used biomass is weighed and data entered into METRC before being sent to waste room to be stored before disposal according to state regulations. Concentrates extracted by individual machines will be weighed out with data entered into METRC, to then go out for testing following state approved transfer procedures to a state regulated testing facility. Once tested, the product is returned to the facility to be packaged by our Dry/Cure team, entered into METRC, and stored before going out to retail or wholesale, or moving over to the Manufacturing department. kitchen.

Extracts transferred into the kitchen are entered into metric, and added according to state requirements to different products designed by the Kitchen Supervisor per regulations set by the state on dosing, shape, sanitary requirements. Once products are produced they are again recorded into METRC and sent to the packaging room to be packaged by the Dry/Cure team in coordination with the Kitchen Assistants to ensure compliance.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design

- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific

training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident

- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Manufacturing CBD and THC Products

Step I (Flower is trimmed and ground to a fine dust)



Step II (Extraction)

The ground flower is then loaded into a Super Critical CO2 Extraction machine. Which uses high pressure and low temperature to keep the product pure.

Each vessel is set at a different pressure, which allows various compounds to be extracted including cannabinoids and terpenoids, allowing maximum extraction of all useful substances. CO2 Extraction is the safest way to Extract Flower, unlike methods using Butane, which are generally illegal due to combustion issues, and the Butane also contributes to an impure product.



Step III (Sonication)

The extracted “resin” is then loaded into a Sonicator, at which point the resin is “agitated” to further facilitate separation of the impurities. Alcohol has been added to facilitate same.



Step IV (Winterization)

The extracted resin is then “Winterized” where it is exposed to sub-zero temperatures to further separate the waxes and chlorophyll.



Step V (Filtration)

The resin is then filtered to remove the waxes and Chlorophyll. What results is beautiful amber oil, which just needs the Ethanol removed.



Step VI (Ethanol Removal)

The Ethanol is removed through a vacuum process, which allows the Ethanol to be reclaimed and re-used.



Step VII (Decarboxylation)

This final step removes a carboxyl group and releases Carbon Dioxide, allowing the human body to absorb the active substances such as THC and CBD.



The finished product can be used as is in by mixing with various oils such as MCT (Coconut Oil, Olive Oil, etc.), or can be mixed into other food products such as “gummies”.

Delivery Plan

Marijuana infused products are delivered in “ready for sale” packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a “just in time” basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie’s Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and by our security services provider and digitally recorded and indexed for review.

Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie's Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and

distribution policies and procedures, as required by 935 CMR 500.000 et seq.
Inventory records as required by

- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals

and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

****Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.**

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

Diverted marijuana shall be reported to law enforcement officials and to the Commission; or
Engaged in unsafe practices with regard to operation of the Marijuana Establishment, 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 shall be reported to the Commission. Said employee shall be subject to immediate dismissal for any of the above infractions.

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

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;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids. Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information

- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access

control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

- (8) The Marijuana Establishment shall maintain the results of all testing for no less than one year;
- (9) The sale of seeds is not subject to these testing provisions.
- (10) Clones are subject to these testing provisions, but are exempt from testing for metals.
- (11) All transportation of marijuana to and from Independent Testing

Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

(12) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);

(13) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and

(14) No marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) that will demonstrate accessible business hours and safe cultivation conditions;

Personnel policies and procedures; and

All background check reports obtained in accordance with 935 CMR 500.030.

Business records, which shall include manual or computerized records of:

Assets and liabilities;

Monetary transactions;
Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
Sales records including the quantity, form, and cost of marijuana products; and
Salary and wages paid to each employee, 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.
Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;

- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment.
- Plumbing shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;

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

"This product may cause impairment and may be habit forming."

"Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug."

"There may be health risks associated with consumption of this product."

"For use only by adults 21 years of age or older. Keep out of the reach of children."

"Marijuana should not be used by women who are pregnant or breastfeeding."

All marketing, advertising and branding produced by or on behalf of Eddie's Flowers, Inc. will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two

hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;
- advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;
- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;

- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
- advertising, marketing or branding of marijuana products, on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- signs or other printed matter advertising any brand or kind of marijuana product that are displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale;
- advertising or marketing of the price of marijuana products, except that Eddie's Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer

than two establishment agents.

- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.

1. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
2. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
3. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be

properly tracked and labeled in a form and manner determined by the Commission.

4. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.

5. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.

6. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.

7. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.

8. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.

9. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

10. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

11. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(d) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(e) Vehicles.

1. A vehicle used for transporting marijuana products must be:
 - a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;
 - b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);
 - c. equipped with an alarm system approved by the Commission; and
 - d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.
2. Marijuana products must not be visible from outside the vehicle.
3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.
4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.
5. No firearms may be located within the vehicle or on a marijuana establishment agent

(f) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.
2. The storage compartment must be sufficiently secure that it cannot be easily removed.
3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.
4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(g) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
 - d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(h) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.
2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.
3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- h. the originating Marijuana Establishment name, address, and registration number;
 - i. the names and registration numbers of the agents who transported the marijuana products;
 - j. the name and registration number of the marijuana establishment agent who prepared the manifest;
 - k. the destination Marijuana Establishment name, address, and registration number;
 - l. a description of the marijuana products being transported, including the weight and form or type of product;
 - m. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
 - n. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
 - i. a signature line for the marijuana establishment agent who receives the marijuana products;
 - n. the weight and inventory before departure and upon receipt;
 - o. the date and time that the transported products were re-weighed and re-inventoried;
 - p. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
 - q. the vehicle make, model, and license plate number.
4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.
 5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(i) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for the Marijuana Transporter prior to transporting or otherwise handling marijuana products.
 2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.
- (j) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

- (4) Access to the Commission, Emergency Responders and Law Enforcement.
- (a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:
1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
 2. Representatives of other state agencies of the Commonwealth; and
 3. Emergency responders in the course of responding to an emergency.
- (b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
- (5) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:
- (a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
 - (b) 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;
 - (c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volatile Organic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

4. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
 5. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.
 6. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.
4. **Our Cultivation building exterior is sealed with an airlock entry**, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

(6) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.

(7) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(8) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(9) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(10) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

- (5) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.
- (6) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.
- (7) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.
- (8) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

Labeling of Marijuana and Marijuana Products

Labeling of Marijuana Not Sold as a Marijuana Product Prior to marijuana being sold or transferred a Marijuana Cultivator shall ensure the placement of a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each package of marijuana that it makes available for retail sale, containing at a minimum the following information:

- The name and registration number of the Marijuana Cultivator that produced the marijuana, together with the retail licensee's business telephone number, electronic mail address, and website information, if any;
- The quantity of usable marijuana contained within the package;
- The date that the Marijuana Retailer or Marijuana Cultivator packaged the contents and a statement of which licensee performed the packaging;
- A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
- The full cannabinoid profile of the marijuana contained within the package, including THC and other cannabinoid level;
- A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
- The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:

- The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:

935 CMR 500.105(5)(a) shall not apply to marijuana packaged by a Marijuana Cultivator for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13) provided however that the retailer is responsible for compliance with 935 CMR 500.105(5) for all marijuana products sold or displayed for consumers.

Labeling of Edible Marijuana Infused Products

Prior to edible marijuana products being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;
- The name of the marijuana product;
- Refrigeration of the product is required, as applicable;
- Net weight or volume in US customary and metric units;
- The quantity of usable marijuana contained within the product as measured in ounces;
- The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
- A list of ingredients, including the full cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
- The serving size of the marijuana product in milligrams if the package is a multiple-serving package;
- The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;
- The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;
- The date of creation and the recommended "use by" or expiration date which shall not be altered or changed;
- A batch number, sequential serial number and bar codes when used, to identify the batch associated with manufacturing and processing;
- Directions for use of the marijuana product if relevant;
- A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- A warning if nuts or other known allergens are contained in the product;
- This statement, including capitalization: "The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose

potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN”;

- The following symbol or easily recognizable mark issued by the Commission that indicates: the package contains marijuana product



1. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



935 CMR 500.105(5)(b) shall apply to edible marijuana products produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13) and shall be in addition to any regulation regarding the appearance of edible marijuana products under 935 CMR 500.150.

Labeling of Marijuana Concentrates and Extracts

Prior to marijuana concentrates or extracts being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:

Pursuant to 935 CMR: CANNABIS CONTROL COMMISSION 500.105 labeling will be as

follows.

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;
 - The name of the marijuana product;
 - Product identity including the word "concentrate" or "extract" as applicable;
 - Net weight or volume expressed in US customary units and metric units;
 - The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
 - A list of ingredients, including the full *Cannabinoid* profile of the marijuana contained within the Marijuana Product, including the amount of delta-9-tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
 - A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;
 - The date of creation and the recommended "use by" or expiration date;
 - A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
 - Directions for use of the marijuana product if relevant;
 - A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
 - A warning if nuts or other known allergens are contained in the product;
 - This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
 - The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:
 - The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:
-
- 935 CMR 500.105(5)(c) shall apply to marijuana concentrates and extracts produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13).

Labeling of Marijuana Infused Tinctures and Topicals

Prior to marijuana infused tinctures or topicals being sold or transferred the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;

- The marijuana product's identity;
- The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
- A list of ingredients, including the full Cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
- Net weight or volume as expressed in US customary units or metric units;
- The date of product creation;
- A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
- Directions for use of the marijuana product if relevant;
- A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- A warning if nuts or other known allergens are contained in the product;
- This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
- The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:
- The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:

935 CMR 500.105(5)(d) shall apply to marijuana-infused tinctures and topicals produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13).

- (d) In circumstances where the labeling of the marijuana product is unreasonable or impractical, the Marijuana Establishment may include the labeling information on a peel-back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.

Packaging

Packaging of Marijuana and Marijuana Products

Tamper or Child-resistant Packaging Licensees licensed subject to 935 CMR 500.050(5) shall ensure that all marijuana products, other than those offered at wholesale by a Marijuana Cultivator, that are provided for sale to consumers by a licensee shall be sold in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), licensees shall ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are 935 CMR: CANNABIS

CONTROL COMMISSION:

- opaque or plain in design;
- resealable for any marijuana product intended for more than a single use or containing multiple servings; and
- certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700; or

2. That where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is:

- capable of being resealed and made tamper or child-resistant again after it has been opened;
- includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
- is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

Limits on Packaging Design

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors. Packaging is explicitly prohibited from:

- using bright colors, defined as colors that are “neon” in appearance;
- imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
- featuring cartoons;
- featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- featuring symbols or celebrities that are commonly used to market products to minors;
- featuring images of minors; or
- featuring words that refer to products that are commonly associated with minors or marketed to minors.
-

Packaging of Multiple Servings.

- 1. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”
- 2. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.
- a. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings.

- b. Notwithstanding 935 CMR 500.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees.
- 3. Packaging for marijuana product beverages shall be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.
- (d) Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.
- (e) Serving size shall be determined by the processor but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-nine tetrahydrocannabinol (9-THC).

Production of edible marijuana products shall take place in compliance with the following:

- All edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*; and
- Any marijuana product that is made to resemble a typical food or beverage product must be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6)
- Eddie's Flowers shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, a Marijuana Product Manufacturer shall satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.
- Eddie's Flowers, selling or otherwise transferring marijuana to another Marijuana Establishment shall provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160.

Timeline

We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

Meeting January 25, 2022 on Zoom 5:30 P.M.

**Marijuana Review Team Application
Retail Cannabis Facility
23 Rindge State Road, Ashburnham, MA**



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
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Retail Operations Plan

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating a within the regulatory standards and to develop as a model within the community.

People

Iyad Jamal, President
576 Main St.

Somers, CT 06071

Iyad, “Eddie” Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and “long, long, hours”, Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, “Bogeys” which also includes the sale of CBD products. The CBD industry is no different than the “Adult Use” Marijuana industry, in that, both are licensed through the Commonwealth of Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the “flower”. CBD contains less than .03 percent THC, and therefore is not **FEDERALLY** prohibited.

In Sum, under the direction of Eddie Jamal, Eddie’s Flowers will help make Ashburnham, MA, the Massachusetts “Success Story”.

David A. Mech, Esq., Secretary and General Counsel 1 Crescent Hill Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie’s Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011 Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in “The Emerald Triangle”.

Mech was also involved in Arizona’s medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona’s Award winning “Level Up” Dispensary.

In 2012 David Mech founded one of the original medical cannabis certification facilities in Massachusetts’ Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept “Coordinated Care” to physicians and encouraging them to work in unison when addressing the needs of “complex care” patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient’s status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public. Mech worked for Burns Security for over ten years as a “special operator”. Mech

worked at a moment's notice, in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford.

Ruben Marques

Ruben and his growing CBD company Erva, is located in Boston's Jamaica Plain section, a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Cultivation **58 Primrose Street** **Indian Orchard, MA 1161**

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, the identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis set forth in Article 17, Sec. 5.20. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior and a which is anticipated to cost \$300,000.00. The intent is to construct a retail space contain display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space which includes its retail space.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as **Exhibit "F"**.)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized

employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to

entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie’s Flowers, Inc. employees and

management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has

been verified, only then will they have been granted access to the building.
of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be places on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur. Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track

daily reimbursements and expenses. The security policies and procedures implemented at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, patients and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc.’s presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie's Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie's Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Good Neighbor Policy

"As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

"We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come."

Code of Conduct

Customers must abide by the following rules and regulations.

All customers must participate in a brief orientation, and provide verified identification.

- State regulations prohibit customers from receiving more than 1 ounce of marijuana and 5 grams of Extracted product per transaction.
- No ingestion of marijuana is allowed on the premises and the smoking of marijuana is not allowed in any public place or on public transportation in the state of

Massachusetts.

- No loud music, unattended barking dogs, or other noise disturbances to the neighborhood are permitted on establishment grounds or nearby premises
- Re-sale of marijuana is prohibited. By state law, all re-sales of medicine will result in immediate suspension of services.
- Loitering and/or littering in our neighborhood is prohibited.
- Posting Eddie's Flowers, Inc. material, including stickers and labels, in public places is prohibited.
- To prevent contamination, customers should never touch the medicine.
- No weapons are allowed at the establishment.
- No littering in the parking lot. All trash must be properly deposited in the trash cans provided.
- All problems and complaints must be directed to Patient Services personnel.

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as

appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Establishment in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for

employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one contracted guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties

- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to threat)

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police

officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be strictly firearm and weapon free.

Diversión

Eddie's Flowers, Inc.'s POS System, METRC, will be able to identify patterns in customer purchases that may suggest product diversion and/or excess customer possession. Eddie's Flowers, Inc. will prominently post and educate customers on possession limits and reserves the right to refuse sales to a customer who exhibits suspicious purchasing patterns. This system will also prevent and deter employee diversion.

In addition to identifying patterns of abuse, Eddie's Flowers, Inc. will intentionally set product pricing at or above the midpoint of the scale locally to discourage diversion and because of the higher quality of medicine that we will sell. To be conservative, we project a 3-5% annual decline in price for the first four years of operations to remain competitive as more establishments come on-line; however, we will actively monitor our pricing to discourage diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement
- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive

- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks
- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass

- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

19. discovery of discrepancies identified during inventory;
20. diversion, theft or loss of any marijuana product;
21. any criminal action involving or occurring on or in the Marijuana Establishment premises;
22. any suspicious act involving the sale, cultivation, distribution, processing or production

of marijuana by any person;

23. unauthorized destruction of marijuana;
24. any loss or unauthorized alteration of records related to marijuana;
25. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
26. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
27. any other breach of security.

Eddie's Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not 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.

Security Audits

Eddie's Flowers, Inc., on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit must be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Marijuana Establishment must also submit a plan to mitigate those concerns within ten business days of submitting the audit.

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins

and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. will submit the following (**Exhibit "A"**) when Application is filed:

4. Articles of Organization (attached presently)
5. Bylaws;

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis

Control Commission it is anticipated that the initial build out will completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 2500 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time and up to 4 part-time jobs.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, "Eddie's Flowers, Inc.", will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers' needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable "Eddie's Flowers, Inc." to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management;

we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Employees

Eddie’s Flowers, Inc. will initially staff its facilities with 15-20 on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), Customer Services Associates (3), Budtenders (13), and Security Associates (3).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment,

verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21, or current registered patients over 18, carrying a valid registration card, and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and

- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings. This will include at least one armed guard.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

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- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Customer Experience

Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one of the following:
 - Driver's License
 - Government-issued ID card
 - Military ID card
 - Passport

Once identification has been verified by a member of our Security team, customers will be signed into a text message notification system which will allow the customer to attend to other business at the facility until they are messaged.

The customer will enter the building through a secure vestibule area/mantrap. This double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, and they have been granted access to the building, one of our Customer Services Associates will attend to the customer's product and educational needs.

The establishment floor will consist of a long service counter containing multiple POS stations spaced a minimum of 4' apart from each other. Product will be on display in the counter and secured under glass; the display will be used to help educate customers as to the amount of THC, CBD, Terpenes, and other compounds, and which combination would best suit the customer's needs. However, the displayed medicine will not be accessible to them.

A Customer Care Associate is assigned to each register. The number of registers open at any given time will be based on customer volume.

Customers will wait in a designated line until the next Customer Care Associate is ready to assist the customer. The customer then will present his or her ID Card.

The Customer Care Associate then assists the patient with selecting product, including determining the type of medicine and/or products needed, quantity needed, and price point. Sales Consultants will be extensively and repeatedly trained and evaluated to ensure they have the skills and knowledge to effectively educate customers about types and effects of each product offering and methods of consumption.

Once medicine and products are selected, the Customer Care Associate rings up the customer, receives payment, bags the order, and ensures the customer's purchase data is immediately updated in the establishment's electronic database. Once the transaction is complete, the PCA calls over the next customer from the line cue.

At the conclusion of the sales process, customers will leave the sales floor and exit the building.

Our POS will be capable of debit card and credit card transactions to reduce cash-on-hand with its potential security threats.

To ensure security, a member of the Security team will monitor a live feed of the establishment floor and another member of the Security team will conduct regular walking inspections of all public areas.

Delivery Plan

Marijuana infused products are delivered in "ready for sale" packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a "just in time" basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie's Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and

by our security services provider and digitally recorded and indexed for review. Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie’s Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by 935 CMR 500.000 et seq. Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a

locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Customer Education

Eddie's Flowers, Inc. will ensure the availability of an adequate supply of up-to-date educational materials. Whenever possible these materials will be available in languages accessible to all patients we serve, as well as for the visually and hearing impaired. These materials will be made available for inspection upon request.

Each customer will receive his or her own copy of our Customer Handbook. The contents of the Handbook contain a wide variety of topics to educate customers about marijuana and Eddie's Flowers, Inc., including:

- Rules and regulations to abide by from state and local laws;
- Research studies on health effects;
- A warning that marijuana has not been analyzed or approved by FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c.90, s. 24, and machinery should not be operated;
- Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
- Tools for tracking the strains used by (patients and their caregivers) and their associated effects;
- Information describing the impact of potency and its role in determining proper dosages and titrations for different routes of administration;
- A discussion of tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;

Service Offerings

Eddie's Flowers, Inc. places a high emphasis on education—we will provide ample information to help customers choose products appropriately and understand how to use them effectively.

Other than services directly related to customers and sales, Eddie's Flowers, Inc. also plans to provide a wide range of other services designed to help customers maintain a healthy lifestyle. Many programs and services will be available at no charge. The list will include workshops, support groups, and other programs, including:

- Modules on marijuana compliance;
- Counseling focusing on proper medication practices and avoiding substance misuse;
- Educational support for those new to the use of marijuana;
- Resource services (referrals for a wide variety of essential life, social and economic services), with an emphasis on the unique needs of our veterans.
- Reading and video materials, providing patient information on marijuana, holistic healing, legality issues, and advocacy/activism;
- Select workshops.

All of these services will be available to customers, free of charge. The retention of services will depend on customer demand and what we learn through our evaluation of community needs.

Additional services, including one or more of those set forth in the list of potential expansion services may be added based upon patient and community feedback.

Customer education will be taking place in the context of virtually every service we offer. As part of our education and counseling, we will offer a library that will include information on general holistic healing, marijuana use, and research. Understanding that patients will have different education levels and reading skills, we plan to offer our material in a variety of formats, including DVD, video, online, and tape formats. We also plan to offer directly and through partner collaborations patient advocate or licensed, clinical, social work services. We will have a full-time staffing position dedicated to:

- Providing one-on-one counseling,
- Managing our referral network to ensure that we have working and trusted alliances with a wide variety of other health care related groups and health care providers, and
- Working with other team members to set up and oversee our slate of customer activities.

To remove barriers to access for certain populations, we plan to offer the following free or reduced-cost services:

- Advocate Referrals. Critical to enabling access to health care will be

providing customers with expert assistance in locating providers and getting necessary referrals. This service will be offered by our center to all customers free of charge.

- Substance Abuse and Misuse Counseling

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance

within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

****Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.**

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

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

Said employee shall be subject to immediate dismissal for any of the above infractions.

Marijuana Establishment's hours of operation and after-hours contact information.

Hours of Operation: Monday -Sunday 8:00 a.m.- 9:00 p.m.

Contact Info: David Mech 1 Crescent Hill Springfield, MA 01105 413-883-3471

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

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;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids. Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all

CORI reports obtained.

- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

(15) The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such

waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

(16) The Marijuana Establishment shall maintain the results of all testing for no less than one year;

(17) The sale of seeds is not subject to these testing provisions.

(18) Clones are subject to these testing provisions, but are exempt from testing for metals.

(19) All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

(20) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);

(21) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and

(22) No marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Employees

Eddie's Flowers, Inc. will initially staff its facility with approximately twenty on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), a Customer Services Associate (4), Budtenders (13), and Security Associates (2).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all

product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment, verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21 and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) that will demonstrate accessible business hours and safe cultivation conditions;

Personnel policies and procedures; and

All background check reports obtained in accordance with 935 CMR 500.030.

Business records, which shall include manual or computerized records of:

Assets and liabilities;

Monetary transactions;

Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

Sales records including the quantity, form, and cost of marijuana products; and

Salary and wages paid to each employee, 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.

Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.

The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment.
- Plumbing shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and

equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21. Additionally we may build a power plant if demand requires.

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;

We will display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases will be transparent. We will also remove a sample of marijuana from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample unless otherwise authorized herein.

The establishment will post prices in the store and may respond to questions about pricing on the phone.

The Establishment will engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public will include the statement "Please Consume Responsibly," in a

conspicuous manner on the face of the advertisement and shall include a minimum of two of the following warnings in their entirety in a conspicuous manner on the face of the advertisement:

“This product may cause impairment and may be habit forming.”

“Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug.”

“There may be health risks associated with consumption of this product.”

“For use only by adults 21 years of age or older. Keep out of the reach of children.”

“Marijuana should not be used by women who are pregnant or breastfeeding.”

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

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;
- advertising, marketing, and branding through certain identified promotional items as

determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;

- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;
- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
- advertising, marketing or branding of marijuana products, on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- signs or other printed matter advertising any brand or kind of marijuana product that are displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale;
- advertising or marketing of the price of marijuana products, except that Eddie’s Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs,

will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.
5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.
12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(e) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(f) Vehicles.

1. A vehicle used for transporting marijuana products must be:

a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;

b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);

c. equipped with an alarm system approved by the Commission; and

d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

2. Marijuana products must not be visible from outside the vehicle.

3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.

4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.

5. No firearms may be located within the vehicle or on a marijuana establishment agent

(g) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.

2. The storage compartment must be sufficiently secure that it cannot be easily removed.

3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for

more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.

4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(h) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
 - d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.
2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent

assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(i) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- o. the originating Marijuana Establishment name, address, and registration number;
- p. the names and registration numbers of the agents who transported the marijuana products;
- q. the name and registration number of the marijuana establishment agent who prepared the manifest;
- r. the destination Marijuana Establishment name, address, and registration number;
- s. a description of the marijuana products being transported, including the weight and form or type of product;
- t. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
- u. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- r. the weight and inventory before departure and upon receipt;
- s. the date and time that the transported products were re-weighed and re-inventoried;
- t. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
- u. the vehicle make, model, and license plate number.

4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(j) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(k) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(6) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
2. Representatives of other state agencies of the Commonwealth; and
3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

(7) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

- (a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
- (b) 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;
- (c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volitile Orgornic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

7. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
8. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.
9. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a

Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.

4. Our Cultivation building exterior is sealed with an airlock entry, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

(11) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.

(12) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(13) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(14) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(15) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

(9) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.

(10) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

(11) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.

(12) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

500.140: Additional Operational procedures for Retail Sale

(1) Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, a Marijuana Retailer may not sell more than one ounce of marijuana or five grams of marijuana

concentrate to a consumer per transaction.

(2) Unauthorized Sales and Right to Refuse Sales.

- (a) Eddie's Flowers, Inc. agents shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.
- (b) Eddie's Flowers, Inc. agents may refuse to sell marijuana products to a consumer if, in the opinion of the marijuana establishment agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.
- (c) Eddie's Flowers, Inc. Agents shall not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.
- (d) Eddie's Flowers, Inc. and its agents is prohibited from selling marijuana products containing nicotine.
- (e) Eddie's Flowers, Inc. is prohibited from selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

(3) Recording Sales.

- (a) Eddie's Flowers, Inc. is using METRC.
 - (b) Eddie's Flowers, Inc. is prohibited from utilizing software or other methods to manipulate or alter sales data.
 - (c) Eddie's Flowers, Inc. shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a retailer determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
 - 1. it shall immediately disclose the information to the Commission;
 - 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - (d) Eddie's Flowers, Inc. shall comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.
 - (e) A retailer shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- (4) Consumer Education. A Marijuana Retailer shall make available educational materials about marijuana products to consumers. A retailer must have an adequate supply of current educational material available for distribution. Educational materials must be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials shall be made available for inspection by the Commission upon request. The Commission will establish fines or other civil penalties for a

Marijuana Establishment's failure to provide these materials. The educational material must include at least the following:

- A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;
 - Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
 - Materials offered to consumers to enable them to track the strains used and their associated effects;
 - Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
- A discussion of tolerance, dependence, and withdrawal;
 - Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
- A statement that consumers may not sell marijuana to any other individual;
 - Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law; and
- Any other information required by the Commission.

(23) Testing. No marijuana product, including marijuana, may be sold by Eddie's Flowers, Inc., or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Timeline

Eddie's Flowers, Inc. is negotiating relationships with several cultivation and manufacturing establishments to obtain product at wholesale prices, until their facilities are constructed and licensed. We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

Meeting January 25, 2022 5:30 P.m. on zoom

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Eddie's Flowers, Inc. ("Eddie's Flowers") will remain compliant at all times with the local zoning requirements set forth in the Town of Ashburnham's Zoning Ordinances.

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

Eddie's Flowers will apply for any other local permits required to operate a Marijuana Retailer at the proposed location, including a Building Permit. Eddie's Flowers will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Retailer at the proposed location.

Eddie's Flowers has already attended several meetings with various municipal officials and boards to discuss their plans for a proposed Marijuana Retailer, was issued a Special Permit, and has executed a Host Community Agreement with the Town of Ashburnham.

Eddie's Flowers will continue to work cooperatively with various municipal departments, boards, and officials to ensure that Eddie's Flowers' Marijuana Retailer remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

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



**Ashburnham Community Outreach
Meeting Notice & Materials**

This Notice is hereby given that Eddie's Flowers, Inc. will hold a Virtual Community Outreach Meeting on 1/25/2022, 5:30 PM to discuss the proposed site of one or more of the following

Adult-use Marijuana Establishment licenses: Marijuana Cultivator; Marijuana Product Manufacturer and Marijuana Retailer to be located at 23 Rindge State Rd. Ashburnham, MA 01430, in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings, M.G.L. ch. 94G, the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 et seq, and other applicable laws and regulations. The Virtual Community Outreach Meeting via Zoom can be joined by visiting:

<https://us02web.zoom.us/j/81759054250?pwd=cGJBbkRWdUhDV3VpcXpQeUY1Nnl2dz09>

Meeting ID: 817 5905 4250

Passcode: 241809

One tap mobile

+16465588656,,81759054250#,,, *241809# US (New York)

+13017158592,,81759054250#,,, *241809# US (Washington DC)

Dial by your location

+1 646 558 8656 US (New York)

+1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

+1 669 900 9128 US (San Jose)

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

Meeting ID: 817 5905 4250

Passcode: 241809

Find your local number:

<https://us02web.zoom.us/j/kc2lhpu3pq>

Topics to be discussed at the meeting will include, but not be limited to:

- The types of Adult-Use Marijuana Establishments to be located at the proposed address;
- Plans for maintaining a secure facility;
- Plans to prevent diversion to minors;
- Plans to positively impact the community; and
- Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance or asked during the meeting and after the presentation. If you have a question you would like to submit in advance, please email info@eddieflowers.net with the subject line "Ashburnham Outreach Meeting Question Submission" no later than 5:00pm on, 1/19/ 2022.

A copy of the meeting presentation will be made available at www.eddiesflowers.net, at least 24 hours prior to the meeting. If you are unable to attend this event, but would like to be included on our mailing list that will provide updates about the facility, please send an email to info@eddiesflowes.net

A copy of this notice is on file with the Town Clerk at Ashburnham MA Town Hall, 32 Main St. Ashburnham, MA 01430 and a copy of this Notice was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment and residents within three hundred feet of the property line of the Marijuana Establishment as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town.

**Ashburnham Community Outreach
Meeting Notice & Materials**

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Meeting ID: 817 5905 4250

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LEGAL NOTICE
NOTICE OF COMMUNITY OUTREACH
EDDIE'S FLOWERS, INC.

Ashburnham Community Outreach Meeting Notice & Materials

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Topic: Community Outreach Meeting - Eddies Flowers

Time: Jan 25, 2022 05:30 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/81759054250?pwd=cGJBbkRWdUhDV3VpcXpQeUY1Nnl2dz09>

Meeting ID: 817 5905 4250

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Notice

Community Outreach Meeting

January 25, 2022

ZOOM MEETING

5:30 PM

David Mech, of Eddie's Flowers LLC. in coordination with the Town of Ashburnham will hold a Zoom Community Outreach meeting as required under CMR 500.101 for a proposed marijuana retail/manufacturing/cultivation site on Wednesday January 25th at 5:30 PM via Zoom use link on mytowngovernment.org/01430.

The proposed facility will be located at 23 Rindge State Road / (Map 71 Parcel 21)

This is open for public to ask questions please log in at designated time.

Abutters

Mailed
~~10/11/21~~

11/10/22

[REDACTED]
446 ASHBY RD
ASHBURNHAM, MA 1430

[REDACTED]
45 SOUTH MAIN STREET
PO BOX 215
ASSONET, MA 02702-0215

[REDACTED]
24 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

[REDACTED]
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

[REDACTED]
492 BILL T DRIVE
READSBORO, VT 5350

[REDACTED]
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1420

[REDACTED]
492 BILL T DRIVE
READSHORO, VT 5350

[REDACTED]
169 BATHERICK ROAD
WESTMINSTER, MA 1473

[REDACTED]
PO BOX 716
ASHBURNHAM, MA 1430

[REDACTED]
3 PILLSBURY RD
ASHBY, MA 1431

[REDACTED]
169 BATHERICK ROAD
WESTMINSTER, MA 1473

[REDACTED]
350 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

[REDACTED]
9 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

[REDACTED]
36 WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
PO BOX 451
BARRE, MA 01005-0451

[REDACTED]
26 WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
39 WATATIC POND ROAD
ASHBURNHAM, MA 1430

[REDACTED]
P.O. BOX 903
ASHBURNHAM, MA 1430

[REDACTED]
26 WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
4 HARDY RD
ASHBURNHAM, MA 1430

[REDACTED]
P.O. BOX 903
ASHBURNHAM, MA 1430

[REDACTED]
9 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
240 WESTMINSTER HILL RD
FITCHBURG, MA 1420

[REDACTED]
P.O. BOX 903
ASHBURNHAM, MA 1430

[REDACTED]
7 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
14 WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
344 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

[REDACTED]
4 LITTLE WATATIC POND RD
PO BOX 1018
ASHBURNHAM, MA 01430-1018

[REDACTED]
PO BOX 1018
ASHBURNHAM, MA 1430

8 WATATIC POND ROAD
ASHBURNHAM, MA 1430

[REDACTED]
5 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

168 MT VERNON ST
FITCHBURG, MA 1420

[REDACTED]
14 RINDGE STATE ROAD
PO BOX 837
ASHBURNHAM, MA 01430-0837

[REDACTED]
352 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

[REDACTED]
P O BOX 219
ASHBY, MA 1431

[REDACTED]
25 WATATIC POND RD
PO BOX 7
ASHBURNHAM, MA 1430

[REDACTED]
465 ASHBY ROAD
ASHBURNHAM, MA 1430

[REDACTED]
11 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
40 WATATIC POND RD
ASHBURNHAM, MA 1430

[REDACTED]
32 MAIN STREET
ASHBURNHAM, MA 1430

LEGAL NOTICE
NOTICE OF COMMUNITY OUTREACH
EDDIE'S FLOWERS, INC.

Ashburnham Community Outreach Meeting Notice & Materials

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Time: Jan 25, 2022 05:30 PM Eastern Time (US and Canada)

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<https://us02web.zoom.us/j/81759054250?pwd=cGJBbkRWdUhDV3VpcXpQeUY1Nnl2dz09>

Meeting ID: 817 5905 4250

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January 25, 2022

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The proposed facility will be located at 23 Rindge State Road / (Map 71 Parcel 21)

This is open for public to ask questions please log in at designated time.

Abutters

Mailed
~~10/11/21~~

11/10/22

ARO, CRAIG
446 ASHBY RD
ASHBURNHAM, MA 1430

CHARLAND PETER F
45 SOUTH MAIN STREET
PO BOX 215
ASSONET, MA 02702-0215

FINCH DOUGLAS
24 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

BERNARD MATTHEW R
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

COLLAZO RAMON
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

GAUDET MARIE S
492 BILL T DRIVE
READSBORO, VT 5350

BERNARD MATTHEW R
25 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

COLLAZO RAMON
348 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1420

GAUDET MARIE S
492 BILL T DRIVE
READSHORO, VT 5350

BESSETTE, GREGORY C.
169 BATHERICK ROAD
WESTMINSTER, MA 1473

COSWELL STEPHEN P
PO BOX 716
ASHBURNHAM, MA 1430

GUZMAN RUDY ALEXANDER
3 PILLSBURY RD
ASHBY, MA 1431

BESSETTE, GREGORY C.
169 BATHERICK ROAD
WESTMINSTER, MA 1473

DAVID BRUCE R
350 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

HANCOCK JAMES D
9 RINDGE STATE ROAD
ASHBURNHAM, MA 1430

BRESLIN TODD M
36 WATATIC POND RD
ASHBURNHAM, MA 1430

DESIGN WITH NATURE INC
PO BOX 451
BARRE, MA 01005-0451

HINES JOSEPH B
26 WATATIC POND RD
ASHBURNHAM, MA 1430

BRYANT RAYMOND
39 WATATIC POND ROAD
ASHBURNHAM, MA 1430

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

HINES PATRICK, DANIEL, JO
26 WATATIC POND RD
ASHBURNHAM, MA 1430

CALLAHAN JUSTIN
4 HARDY RD
ASHBURNHAM, MA 1430

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

HOLMES PAUL R
9 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

CARBONE, CHRISTOPHER
240 WESTMINSTER HILL RD
FITCHBURG, MA 1420

EARTH LAND DEVELOPMENT, L
P.O. BOX 903
ASHBURNHAM, MA 1430

JAMIESON DEBRA A (FKA LAR
7 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

CARBONE, CHRISTOPHER
14 WATATIC POND RD
ASHBURNHAM, MA 1430

FICHTEL ANDREW W
344 RINDGE TURNPIKE ROAD
ASHBURNHAM, MA 1430

LEHTONEN ANGEL M
4 LITTLE WATATIC POND RD
PO BOX 1018
ASHBURNHAM, MA 01430-1018

LEHTONEN ANGELA MAY
PO BOX 1018
ASHBURNHAM, MA 1430

VERRECCHIA BETTY J
8 WATATIC POND ROAD
ASHBURNHAM, MA 1430

MACNEIL ANDREW J
5 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

WELCH JAMES F
168 MT VERNON ST
FITCHBURG, MA 1420

MURRAY TIMOTHY D
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PO BOX 837
ASHBURNHAM, MA 01430-0837

NOLAN KIM E
352 RINDGE TURNPIKE RD
ASHBURNHAM, MA 1430

OJALA CHRISTOPHER S
P O BOX 219
ASHBY, MA 1431

RICKHEIT HANS
25 WATATIC POND RD
PO BOX 7
ASHBURNHAM, MA 1430

ROY RICHARD A
465 ASHBY ROAD
ASHBURNHAM, MA 1430

SHELL CARL W
11 LITTLE WATATIC POND RD
ASHBURNHAM, MA 1430

SMITH, LYND A
40 WATATIC POND RD
ASHBURNHAM, MA 1430

TOWN OF ASHBURNHAM
32 MAIN STREET
ASHBURNHAM, MA 1430

PLANS FOR POSITIVE IMPACT

It is the intention of Eddie's Flowers to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by cannabis prohibition and enforcement and to positively impact those communities pursuant to M.G.L. c. 94G, § 4.

We will target past or present residents of the geographic "areas of disproportionate impact.

Goals

1. Reducing barriers to entry in the commercial adult-use cannabis industry for disproportionately harmed people.

Program-Job Creation

Eddie's Flowers intends to hire at least 50% of its employees from areas of disproportionate impact. These include people who have been convicted of marijuana related offenses, and minorities and women who live in these areas. The towns we will target are Worcester, Fitchburg and Spencer. We will advertise the Fitchburg Sentinel and Enterprise, Worcester Telegram, and Spencer New Leader newspapers.

We will target the following Worcester Census Tracts, along with the Fitchburg and Spencer areas.

Census Tract 7314

Census Tract 7313

Census Tract 7317

Census Tract 7315

Census Tract 7325

Census Tract 7312.03

Census Tract 7320.01

Measurements:

Number of employees hired, retained, or promoted that come from disproportionate impacted areas or one of the other groups of people previously identified in this guidance; number/percentage of disproportionately harmed employees in total compared to total number of employees. Measurements will be conducted quarterly, with an annual summary provided upon renewal of said license.

2. Providing mentoring, professional, and technical services for disproportionately harmed people along with providing business assets or other benefits for disproportionately harmed people.

We will offer seminars offering knowledge, and information regarding business startups in the Cannabis industry, concentrating in the manufacturing aspect of the industry. The seminars will be held quarterly in Fitchburg MA, at the Fitchburg Public Library, and the Worcester Public Library. We expect to accommodate at least 50 people per seminar, and will accommodate larger groups upon demand. We will also conduct meetings on Zoom.

The seminars will be advertised in the Fitchburg Sentinel and Enterprise, Worcester Telegram, and Spencer New Leader newspapers.

Those interested in manufacturing cannabis products will be invited to join our “White Labeling/Green Enabling” program.

This program will offer qualified candidates the opportunity to develop a product, have the product manufactured by Eddie’s Flowers, and also provided with the necessary education, including manufacturing and marketing training, to ensure the growth and success of our disproportionately impacted business “partners”.

The candidate can also choose to participate in the program, “hands on”, by becoming an Agent of Eddie’s Flowers Manufacturing and Cultivation divisions, when licensed. Eddies Flowers will be sending candidates to work at other manufacturing facilities as

well as agents, according to their manufacturing interests.

We will target the following Worcester Census Tracts, along with the Fitchburg and Spencer areas.

Census Tract 7314

Census Tract 7313

Census Tract 7317

Census Tract 7315

Census Tract 7325

Census Tract 7312.03

Census Tract 7320.01

Measurements: The amount of successful new businesses created. Number and subject matter of trainings/seminars offered and performed, with documentation of attendance by people from disproportionately harmed communities; and the Number of businesses owned by disproportionately harmed people that obtained training or assistance from the programs, along with the businesses' assessment of the programs.

Measurements will be conducted quarterly, with an annual summary provided at renewal of license.

3. In addition, we will offer expungement services for employees and other members of the Worcester, Fitchburg and communities, Spencer through Attorney David Mech. Mech will conduct these services through an educational and hands on seminar conducted during the company's quarterly seminars in Fitchburg and Worcester.

We will target the following Worcester Census Tracts, along with the Fitchburg and Spencer areas.

Census Tract 7314

Census Tract 7313

Census Tract 7317

Census Tract 7315

Census Tract 7325

Census Tract 7312.03

Census Tract 7320.01

Mech will explain the options of sealing or expunging the record, and will provide written information and assistance to enable the “client” to apply for relief. This process is simple, merely requiring the individual to send the provided form to the Division of Probation. It is free as well to file. There is no required hearing. This program is available to those with possession convictions of two ounces or less. All services are free.

Measurements: The amount of expungements achieved. . Measurements will be conducted quarterly, with an annual summary provided upon renewal of license.

The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and

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

**BYLAWS
EDDIES FLOWERS, INC.**

SECTION 1

Articles of Organization

The name of the corporation shall be as set forth in the articles of organization. These bylaws, the powers of the corporation and of its directors and shareholders, and all matters concerning the conduct and regulation of the business of the corporation shall be subject to the articles of organization. All references in these bylaws to the articles of organization shall mean the articles of organization of the corporation, as from time to time in effect. All references in these bylaws to the Massachusetts Business Corporation Act shall mean Massachusetts General Laws Chapter 156D, as from time to time in effect.

SECTION 2

Shareholders

2.1 Annual Meeting

The annual meeting of the shareholders shall be held on the *[third Tuesday of March]* if it is not a legal holiday, and if it is a legal holiday, then on the next succeeding day not a legal holiday, at the hour stated in the written notice of such meeting, or on such other date as may be determined by the board of directors. Except as otherwise may be provided in the articles of organization, purposes for which an annual meeting is to be held, in addition to the election of directors, may be specified by the board of directors or by the President and stated in the notice of the meeting.

2.2 Special Meetings

Special meetings of the shareholders may be called by the President or the board of directors. A special meeting of the shareholders shall be called by the Secretary, or in the case of the death, absence, incapacity, or refusal of the Secretary, by any other officer, if the holders of at least 10 percent of the votes entitled to be cast on any issue to be considered at the proposed special meeting sign, date, and deliver to the Secretary one or more demands for the meeting describing the purpose for which it is to be held. Such call shall state the date, time, place, and purposes of the meeting.

2.3 Place of Meetings; Remote Participation

All meetings of the shareholders shall be at the principal office of the corporation or at such other place as the board of directors, the President, or the person or persons calling the meeting may determine. If authorized by the directors, any meeting of shareholders need not be held at any place but instead may be held solely by remote communication. Shareholders and proxyholders not physically present at a meeting of shareholders may participate in a meeting of shareholders, be deemed present in person, and vote at a meeting of shareholders, by means of remote communication, subject to such guidelines and procedures as the board of directors may adopt. Such guidelines and procedures shall include reasonable measures (1) to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder, and (2) to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the

shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings. If any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, the corporation shall maintain a record of such vote or other action.

.4 Notice of Shareholder Meetings

A written notice of each meeting of shareholders, stating the place, day, and hour of such meeting and the purposes for which the meeting is called, shall be given by the Secretary, Assistant Secretary, President, or such person designated by the board of directors, at least seven and no more than 60 days before the meeting, to each shareholder entitled to such notice. A shareholder may waive any notice required by the Massachusetts Business Corporation Act, the articles of organization, or the bylaws, before or after the date and time stated in the notice. The waiver shall be in writing, signed by the shareholder entitled to the notice, and delivered to the corporation for inclusion with the records of the meeting. A shareholder's attendance at a meeting waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting. A shareholder's attendance at a meeting waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

2.5 Action at Meeting

Unless otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, at any meeting of the shareholders, a majority of the votes entitled to be cast upon a matter by a voting group at the meeting shall constitute a quorum of that voting group for action on that matter, but a lesser interest may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. A share once represented by the shareholder, proxy, or agent or by a person authorized to act for the shareholder, proxy, or agent; and (2) the date on which such shareholder, proxy, agent, or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered the date on which it was signed. The electronic transmission shall be considered received by the corporation if it has been sent to any address specified by the corporation for that purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

SECTION 3

Directors

3.1 Number and Election

The corporation shall have a board of directors consisting of one or more individuals. The board of directors shall be elected by such shareholders as have the right to vote at the annual meeting of the shareholders or at a special meeting held in place thereof. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election. Subject to any minimum

number of directors required by the Massachusetts Business Corporation Act, the number of directors shall be fixed by vote at the meeting at which they are elected, but the shareholders, at any special meeting held for the purpose, or a majority of the directors then in office, may increase the number of directors as thus fixed and elect new directors to complete the number so fixed, and the shareholders, at any such special meeting, may decrease the number of directors as thus fixed and remove directors to reduce the number of directors to the number so fixed. Subject to the articles of organization and these bylaws, each director shall hold office until the next annual meeting and until his or her successor is elected and qualified.

3.2 Resignation, Removal, and Vacancy

A director may resign at any time by delivering written notice of resignation to the board of directors, its chairman, or the corporation. Except as otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws: (1) the shareholders may remove one or more directors with or without cause, (2) the directors may remove a director for cause by vote of a majority of the directors then in office, and (3) the shareholders or board of directors may fill any vacancy, or if the directors remaining in office constitute fewer than a quorum of the board, they may fill the vacancy by the affirmative vote of a majority of all the directors remaining in office.

3.3 Powers of Directors

Subject to law and the articles of organization, all corporate power shall be exercised by or under the authority of, and the business and affairs of the corporation shall be managed under the direction of, its board of directors.

3.4 Regular Meetings

Regular meetings of the board of directors may be held without call or formal notice at such places and at such times as the board may by vote from time to time determine. A regular meeting of the board of directors may be held without call or formal notice immediately after and at the same place as the annual meeting of the shareholders, or the special meeting of the shareholders held in place of such annual meeting.

3.5 Special Meetings

Special meetings of the board of directors may be held at any time and at any place when called by the President, Treasurer, or two or more directors, or the sole director if there is only one director. Notice of such meeting shall be given to each director by the Secretary or, if there is no Secretary, or in case of the death, absence, incapacity, or refusal of the Secretary, by the officer or directors calling the meeting. Such notice (1) must be given at least two days prior to the date of the special meeting, and (2) need not describe the purpose of the meeting unless otherwise required by the articles of organization or these bylaws.

3.6 Waiver of Notice

A director may waive notice of any directors' meeting before or after the date of the meeting. The waiver shall be in writing, signed by the director entitled to the notice, or in the form of an electronic transmission by the director to the corporation, and filed with the minutes or corporate records. A director's attendance at or participation in a meeting waives any required notice to such director of the meeting unless the director, at the beginning of the meeting or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to

action taken at the meeting.

3.7 Quorum and Voting

A majority of the directors then in office shall constitute a quorum for the transaction of business, but a lesser number may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. If a quorum is present when a vote is taken, the affirmative vote of a majority of the directors present is the act of the board of directors, unless the vote of a greater number of directors is required by the articles of organization or these bylaws.

3.8 Action by Consent

Any action by the board of directors may be taken without a meeting by unanimous consent by the directors and filed with the records of the directors' meetings. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each director, or delivered to the corporation by electronic transmission, to the address specified by the corporation for the purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer having custody of the records of proceedings of directors. Such consent shall be treated as a vote of the board of directors for all purposes.

3.9 Remote Participation

Members of the board of directors or any committee designated by the board of directors may participate in a meeting of the board or such committee, or conduct any such meeting, through the use of any means of communication by which all directors participating may simultaneously hear each other during the meeting and participation by such means shall constitute presence in person at the meeting.

3.10 Committees

Except as otherwise provided in the articles of organization the board of directors may, by vote of a majority of the directors, appoint from its own number a committee or committees, consisting of one or more members who shall serve at the pleasure of the board of directors and which may exercise such authority of the board of directors as is delegated by the board, except for those powers which, pursuant to the Massachusetts Business Corporation Act, may not be delegated to any such committee. Subject to the Massachusetts Business Corporation Act, the provisions of such Act, and these bylaws governing meetings, action without meetings, notice and waiver of notice, and quorum and voting requirements of the board of directors shall apply to committees and their members.

SECTION 4

Officers

4.1 Identity, Election, and Appointment of Officers

The officers of the corporation shall consist of a President, Treasurer, and Secretary, who shall be elected by the board of directors, and such other officers as the board of directors may appoint.

4.2 Duties and Powers; Qualification and Tenure

Subject to these bylaws, each officer shall have, in addition to the duties and powers

specifically set forth in these bylaws, such duties and powers as are customarily incident to his or her office and such duties and powers as the board of directors may from time to time designate. Any officer may, but need not, be a shareholder or director. Any two or more offices may be held by the same person. Any officer may be required by the board of directors to give bond for the faithful performance of his or her duties to the corporation in such amount and with such sureties as the board of directors may determine. Except as otherwise provided by law, the articles of organization, these bylaws, or the directors' resolution electing or appointing such officer, the President, Treasurer, and Secretary shall hold office until the first meeting of the board of directors following the annual meeting of shareholders and thereafter until his or her successor is elected and qualified, and all other officers shall hold office until the respective successor of each is elected and qualified.

4.3 President

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the board of directors, have general supervision and control of its business. Unless otherwise provided by the board of directors, the President shall preside, if present, at all meetings of shareholders and of the board of directors.

4.4 Treasurer

The Treasurer, subject to the direction and under the supervision of the board of directors, shall have general charge of the financial concerns of the corporation and the care and custody of the funds and valuable papers of the corporation, except his or her own bond. The Treasurer shall keep, or cause to be kept, accurate books of account, which shall be the property of the corporation..

4.5 Secretary

The Secretary shall keep a record of the meetings of shareholders, the board of directors, and any executive and other committees. In the absence of the Secretary from any such meetings, an Assistant Secretary, if one has been elected, otherwise a Temporary Secretary, designated by the person presiding at the meeting, shall perform the duties of the Secretary.

4.6 Removal and Vacancies

The board of directors may remove any officer at any time with or without cause, and may fill any vacancy in any office.

SECTION 5

Capital Shares

5.1 Share Certificates

Each shareholder shall be entitled to a share certificate in such form as is prescribed by law and approved from time to time by the board of directors. The certificates shall be signed by the President or any Vice President and by the Treasurer or any Assistant Treasurer. Such signatures may be facsimiles. If any officer who has signed or whose facsimile signature has been placed on such certificate no longer holds office when the certificate is issued, the certificate nevertheless shall be valid.

5.2 Transfer of Shares

Subject to restrictions, if any, imposed by the articles of organization, title to a share certificate and to the shares represented thereby shall be transferred only by delivery of the certificate properly endorsed, or by delivery of the certificate accompanied by a written assignment of shares represented by such certificate, or a written power of attorney to sell,

assign, or transfer the certificate or the shares represented thereby, properly executed. The person registered in the records of the corporation as the owner of shares shall have the exclusive right to receive dividends thereon and to vote thereon as such owner, shall be held liable for such calls and assessments, if any, as may lawfully be made thereon, and, except only as may be required by law, may in all respects be treated by the corporation as the exclusive owner thereof unless and to the extent that the corporation has established a procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the corporation as the shareholder.

5.3 Transfer Records

Unless a transfer agent is appointed, the Secretary shall keep or cause to be kept, at the principal office of the corporation or at the office of the Secretary, the share and transfer records of the corporation, in which are contained the names of all shareholders and the record address and the amount of shares held by each. The transfer records of the shares of the corporation may be closed for such period from time to time in anticipation of shareholders' meetings or the declaration or payment of dividends as the board of directors may determine.

5.4 Lost or Destroyed Certificates

In case of the alleged loss, destruction, or mutilation of a share certificate, a new share certificate may be issued in place of the lost, destroyed, or mutilated certificate upon such terms as the board of directors may determine.

SECTION 6

Fiscal Year

Except as from time to time otherwise determined by the board of directors, the fiscal year of the corporation shall end on [*December 31*].

SECTION 7

Indemnification

The corporation shall indemnify and hold harmless each present or former director or officer of the corporation to the fullest extent permitted by law, subject to such determination as the law may require that indemnification is permissible, for any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, arbitrative, or investigative, and whether formal or informal ("Proceeding"), against such director or officer in his or her capacity as such or in his or her capacity as a director, officer, partner, trustee, manager, employee, or agent of another domestic or foreign corporation, partnership, joint venture, trust, limited liability company, employee benefit plan, or other entity, if the corporation requested him or her to so serve. A director or officer is considered to be serving an employee benefit plan at the corporation's request if his or her duties to the corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or beneficiaries of the plan. The corporation may, before final disposition of any Proceeding, advance funds to pay for or reimburse the reasonable expenses incurred by a director or officer who is a party to a Proceeding to the extent permitted by law. Nothing in this Section shall affect any rights to indemnification to which any person may be entitled by contract or otherwise under law. No amendment or

repeal of any provision of this Section shall adversely affect the right of a person to indemnification under this Section with respect to his or her acts or omissions that occurred at any time prior to such amendment or repeal.

SECTION 8

Other Provisions

8.1 Notices

Notices to or from any shareholder, director, officer, or the corporation may be given in any manner permitted under the Massachusetts Business Corporation Act.

8.2 Voting of Securities

Except as the board of directors may otherwise designate, the President may waive notice of, or vote for this corporation or appoint any person or persons to act as proxy or attorney in fact for this corporation with or without power of substitution at, any meeting of shareholders of any other corporation or organization, the securities of which may be held by this corporation.

SECTION 9

Amendments

These bylaws may be amended or repealed by the shareholders. If authorized by the articles of organization, the board of directors may also make, amend, or repeal the bylaws in whole or in part, except with respect to this Section and any provision of these bylaws which, by an express provision in the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, requires action by the share-holders. Not later than the time of giving notice of the meeting of shareholders next following the making, amending, or repealing by the board of directors of any bylaw, notice stating the substance of the action taken by the board of directors shall be given to all shareholders entitled to vote on amending the bylaws. Any action taken by the board of directors with respect to the bylaws may be amended or repealed by the shareholders.



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

mass.gov/dor

Letter ID: L1162383040
Notice Date: March 10, 2022
Case ID: 0-001-443-774



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EDDIE'S FLOWERS, INC.
23 RINDGE STATE RD
ASHBURNHAM MA 01430-1106

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, EDDIE'S FLOWERS, INC. is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

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

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

What if I have questions?

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

Visit us online!

Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001451202

ARTICLE I

The exact name of the corporation is:

EDDIE'S FLOWERS, INC.

ARTICLE II

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

THE CORPORATION WILL NOT ENGAGE IN ANY ACTIVITY THAT REQUIRES A LICENSE BY THE MASS DEPARTMENT OF HEALTH OR CANNABIS CONTROL COMMISSION.

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CNP	\$0.00000	100	\$0.00	100

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

ARTICLE IV

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

N/A

ARTICLE V

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

NO SHARES MAY BE TRANSFERRED TO ANY OTHER PERSON OR ENTITY UNLESS CONSENT IS GIVEN BY ALL SHAREHOLDERS AND THE BOARD OF DIRECTORS.

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: DAVID MECH
No. and Street: 1 CRESCENT HILL
City or Town: SPRINGFIELD State: MA Zip: 01105 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	IYAD JAMAL	576 MAIN ST. SOMERS, CT 06071 USA
TREASURER	IYAD JAMAL	576 MAIN ST. SOMERS, CT 06071 USA
SECRETARY	DAVID MECH	1 CRESCENT HILL SPRINGFIELD, MA 01105 USA
DIRECTOR	IYAD JAMAL	576 MAIN ST. SOMERS, CT 06071 USA
DIRECTOR	DAVID MECH	1 CRESCENT HILL SPRINGFIELD, MA 01105 USA
DIRECTOR	RUBEN MARQUIS	22 LEE HILL RD. BOSTON, MA 01105 USA

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

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

RETAIL SALES, AGRICULTURE, MANUFACTURING

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

No. and Street: 1 CRESCENT HILL
City or Town: SPRINGFIELD State: MA Zip: 01105 Country: USA

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

No. and Street: 1 CRESCENT HILL
1 CRESCENT HILL
City or Town: SPRINGFIELD State: MA Zip: 01105 Country: USA

which is

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

Signed this 2 Day of August, 2020 at 3:08:02 PM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

/DAVID A. MECH/

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 02, 2020 03:03 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



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

William Francis Galvin
Secretary of the
Commonwealth

Date: March 16, 2022

To Whom It May Concern :

I hereby certify that according to the records of this office,
EDDIE'S FLOWERS, INC.

is a domestic corporation organized on **August 02, 2020** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

A handwritten signature in blue ink, reading "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 22030329180

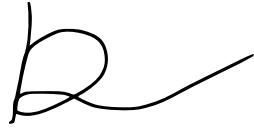
Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by: ili

AFFIDAVIT OF DAVID A. MECH
(Unemployment Insurance Requirement)

1. My name is David A. Mech.
2. I am Secretary of Eddie's Flowers, Inc., Application no. MRN284579.
3. We are unable to register with the Department of Unemployment Assistance, as we are not hiring staff until at least July of 2022.

SIGNED UNDER THE PENALTY OF PERJURY, THIS 22ND DAY OF APRIL, 2022

A handwritten signature in black ink, appearing to be 'D. Mech', written over a horizontal line.

David A. Mech

Plan for Obtaining Liability Insurance.

We have used Neil and Neil in the past for quotes and insurance. We will obtain a policy in the liability amount of \$1,000,000/\$2,000,000.00 with a \$5,000.00 deductible maximum. We will also have insurance covering losses to property and income as well.

David Jarry has been my agent for years. We obtained a quote for another potential project. We see no problems with this project.

Business Plan

Retail Cannabis Facility

23 Rindge State Road, Ashburnham, MA



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
Fax: (413) 732-4206
gignation@gmail.com
July 28, 2022

Business Plan

Applicant has obtained its Community Host Agreement and has obtained Special Permits.

Program Assumptions

The program as incorporated in the Marijuana Review Team Application submission of February 5, 2021 and supplemented by an EIS dated March 22, 2021, would see an existing retail facility redeveloped for a Cannabis Dispensary and related activities including facilities for cultivation and processing.

The redevelopment will include renovation of the retail sales area, potential reuse of the second floor for operations and storage and construction of a cultivation/processing structure.

The total building area will be approximately 3,400 gross square feet of retail and support space and the cultivation/manufacturing structure will be approximately 30,000 gross square feet of which 10,000 SF would be dedicated to cultivation/manufacturing. Site improvements will include provisions for approximately 23 parking spaces. Eddie's Flowers has submitted applications for Cultivation and Manufacturing on July 25, 2022.

We are assuming the renovations will involve adapting the existing retail sales area including providing a new entrance, creating a secure waiting area, providing space for packaging and a vault. The upper floor will not be adapted for processing but used for office space and storage

to supplement the first floor program.

As noted above scope would also include the construction of a cultivation facility with the proponent leaning toward a modular building, not a greenhouse thus allowing for increased product grow. For purposes of this proposal we estimate construction costs as follows:

- Retail Facility Renovations – 3,400SF @\$100/SF = \$340,000
- Cultivation/Processing Facility – 10,000 SF @ \$200/SF = \$2,000,000

(We intend to increase our cultivation capacity as needed)

- Landscape Improvements (paving, sidewalks, planting & lighting) = \$75,000
- Total Initial Budget = \$2,400,000

Proposed Timeline Retail

January 25, 2022 - Community Outreach Meeting. Completed.

July 28, 2022- CCC additional information submitted.

August 15, 2022- Receive Provisional License.

December 1, 2022- Final Inspection/licensing.

February 1, 2023- Commence Operations.

Retail Operations Plan

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating within the regulatory standards and to develop as a model within the community.

People

Iyad Jamal, President
576 Main St.
Somers, CT 06071

Iyad, "Eddie" Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and "long, long, hours", Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, "Bogeys" which also includes the sale of CBD products. The CBD industry is no different than the "Adult Use" Marijuana industry, in that, both are licensed through the Commonwealth of Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the "flower". CBD contains less than .03 percent THC, and therefore is not FEDERALLY prohibited.

In Sum, under the direction of Eddie Jamal, Eddie's Flowers will help make Ashburnham, MA, the Massachusetts "Success Story".

David A. Mech, Esq., Secretary and General Counsel
1 Crescent Hill
Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie's Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011 Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in "The Emerald Triangle".

Mech was also involved in Arizona's medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona's Award winning "Level Up" Dispensary.

In 2012 David Mech founded one of the original medical cannabis certification facilities in Massachusetts' Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept "Coordinated Care" to physicians and encouraging them to work in unison when addressing the needs of "complex care" patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient's status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public. Mech worked for Burns Security for over ten years as a "special operator". Mech worked at a moment's notice, in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis set forth in Article 17, Sec. 5.20. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior and a which is anticipated to cost \$300,000.00. The intent is to construct a retail space contain display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space which includes its retail space.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location.

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper

alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers

with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in "Security Procedures") and patrolling security personnel, outside the premises 24 hours

per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe ("vault"). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie's Flowers, Inc. employees and management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, only then will they have been granted access to the building.
of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur.

Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use

internal loss prevention methods, standard retail cash handling procedures, and track daily reimbursements and expenses. The security policies and procedures implemented at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, patients and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel.

All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or

another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video

will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, "it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived."
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI's Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie's Flowers, Inc.'s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie's Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie's Flowers, Inc.'s presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie's Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie's Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Good Neighbor Policy

"As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

"We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to

serve you for years to come.”

Code of Conduct

Customers must abide by the following rules and regulations.

All customers must participate in a brief orientation, and provide verified identification.

- State regulations prohibit customers from receiving more than 1 ounce of marijuana and 5 grams of Extracted product per transaction.
- No ingestion of marijuana is allowed on the premises and the smoking of marijuana is not allowed in any public place or on public transportation in the state of Massachusetts.
- No loud music, unattended barking dogs, or other noise disturbances to the neighborhood are permitted on establishment grounds or nearby premises
- Re-sale of marijuana is prohibited. By state law, all re-sales of medicine will result in immediate suspension of services.
- Loitering and/or littering in our neighborhood is prohibited.
- Posting Eddie’s Flowers, Inc. material, including stickers and labels, in public places is prohibited.
- To prevent contamination, customers should never touch the medicine.
- No weapons are allowed at the establishment.
- No littering in the parking lot. All trash must be properly deposited in the trash cans provided.
- All problems and complaints must be directed to Patient Services personnel.

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that

the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Establishment in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire,

earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one contracted guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security stuff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and

- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to threat)

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple

issues.

- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be strictly firearm and weapon free.

Diversion

Eddie's Flowers, Inc.'s POS System, METRC, will be able to identify patterns in customer purchases that may suggest product diversion and/or excess customer possession. Eddie's Flowers, Inc. will prominently post and educate customers on possession limits and reserves the right to refuse sales to a customer who exhibits suspicious purchasing patterns. This system will also prevent and deter employee diversion.

In addition to identifying patterns of abuse, Eddie's Flowers, Inc. will intentionally set product pricing at or above the midpoint of the scale locally to discourage diversion and because of the higher quality of medicine that we will sell. To be conservative, we project a 3-5% annual decline in price for the first four years of operations to remain competitive as more establishments come on-line; however, we will actively monitor our pricing to discourage diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement
- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)

- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks
- Theft, unauthorized disclosure, loss, malicious destruction of proprietary

information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same

- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass
- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be

maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

1. discovery of discrepancies identified during inventory;
2. diversion, theft or loss of any marijuana product;
3. any criminal action involving or occurring on or in the Marijuana Establishment premises;
4. any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
5. unauthorized destruction of marijuana;
6. any loss or unauthorized alteration of records related to marijuana;
7. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
8. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
9. any other breach of security.

Eddie's Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not 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.

Security Audits

Eddie's Flowers, Inc., on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit must be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Marijuana Establishment must also submit a plan to mitigate those concerns within ten business days of submitting the audit.

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the

event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. will submit the following **(Exhibit "A")** when Application is filed:

1. Articles of Organization
2. Bylaws;

Eddie's Flowers, Inc. has entered into a Community Host Agreement with the Town of Ashburnham, and has obtained a Special Permit. Upon approval from the Cannabis Control Commission it is anticipated that the initial build out will completed within four (4) months. We anticipate a provisional license being issued by August 15, 2022.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10). Eddie's Flowers is also Bonded in the amount of \$5,000.00 in the event of a business wind-down.

Eddie's Flowers, Inc.'s state of the art 2500 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time and up to 4 part-time jobs.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, "Eddie's Flowers, Inc.", will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and

community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers' needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable “Eddie’s Flowers, Inc.” to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management; we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Employees

Eddie's Flowers, Inc. will initially staff its facilities with 15-20 on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), Customer Services Associates (3), Budtenders (13), and Security Associates (3).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment, verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21, or current registered patients over 18, carrying a valid registration card, and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner,

while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and

- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings. This will include at least one armed guard.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individual's shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Customer Experience

Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one of the following:
 - Driver's License
 - Government-issued ID card
 - Military ID card
 - Passport

Once identification has been verified by a member of our Security team, customers will be signed into a text message notification system which will allow the customer to attend to other business at the facility until they are messaged.

The customer will enter the building through a secure vestibule area/mantrap. This double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, and they have been granted access to the building, one of our Customer Services Associates will attend to the customer's product and educational needs.

The establishment floor will consist of a long service counter containing multiple POS stations spaced a minimum of 4' apart from each other. Product will be on display in the counter and secured under glass; the display will be used to help educate customers as to the amount of THC, CBD, Terpenes, and other compounds, and which combination would best suit the customer's needs. However, the displayed medicine will not be accessible to them.

A Customer Care Associate is assigned to each register. The number of registers open at any given time will be based on customer volume.

Customers will wait in a designated line until the next Customer Care Associate is ready to assist the customer. The customer then will present his or her ID Card.

The Customer Care Associate then assists the patient with selecting product, including determining the type of medicine and/or products needed, quantity needed, and price point. Sales Consultants will be extensively and repeatedly trained and evaluated to ensure they have the skills and knowledge to effectively educate customers about types and effects of each product offering and methods of consumption.

Once medicine and products are selected, the Customer Care Associate rings up the customer, receives payment, bags the order, and ensures the customer's purchase data is immediately updated in the establishment's electronic database. Once the transaction is complete, the PCA calls over the next customer from the line cue.

At the conclusion of the sales process, customers will leave the sales floor and exit the building.

Our POS will be capable of debit card and credit card transactions to reduce cash-on-hand with its potential security threats.

To ensure security, a member of the Security team will monitor a live feed of the establishment floor and another member of the Security team will conduct regular walking inspections of all public areas.

Delivery Plan

Marijuana infused products are delivered in "ready for sale" packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a "just in time" basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie's Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital

inventory logs, the vault will be monitored 24/7 by remote access camera monitors and by our security services provider and digitally recorded and indexed for review. Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie’s Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault

Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by 935 CMR 500.000 et seq.
- Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic

marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Customer Education

Eddie's Flowers, Inc. will ensure the availability of an adequate supply of up-to-date educational materials. Whenever possible these materials will be available in languages accessible to all patients we serve, as well as for the visually and hearing impaired. These materials will be made available for inspection upon request.

Each customer will receive his or her own copy of our Customer Handbook. The contents of the Handbook contain a wide variety of topics to educate customers about marijuana and Eddie's Flowers, Inc., including:

- Rules and regulations to abide by from state and local laws;
- Research studies on health effects;
- A warning that marijuana has not been analyzed or approved by FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c.90, s. 24, and machinery should not be operated;
- Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
- Tools for tracking the strains used by (patients and their caregivers) and their associated effects;
- Information describing the impact of potency and its role in determining proper dosages and titrations for different routes of administration;

- A discussion of tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;

Service Offerings

Eddie's Flowers, Inc. places a high emphasis on education—we will provide ample information to help customers choose products appropriately and understand how to use them effectively.

Other than services directly related to customers and sales, Eddie's Flowers, Inc. also plans to provide a wide range of other services designed to help customers maintain a healthy lifestyle. Many programs and services will be available at no charge. The list will include workshops, support groups, and other programs, including:

- Modules on marijuana compliance;
- Counseling focusing on proper medication practices and avoiding substance misuse;
- Educational support for those new to the use of marijuana;
- Resource services (referrals for a wide variety of essential life, social and economic services), with an emphasis on the unique needs of our veterans.
- Reading and video materials, providing patient information on marijuana, holistic healing, legality issues, and advocacy/activism;
- Select workshops.

All of these services will be available to customers, free of charge. The retention of services will depend on customer demand and what we learn through our evaluation of community needs.

Additional services, including one or more of those set forth in the list of potential expansion services may be added based upon patient and community feedback.

Customer education will be taking place in the context of virtually every service we offer. As part of our education and counseling, we will offer a library that will include information on general holistic healing, marijuana use, and research. Understanding that patients will have different education levels and reading skills, we plan to offer our material in a variety of formats, including DVD, video, online, and tape formats. We also plan to offer directly and through partner collaborations patient advocate or licensed, clinical, social work services. We will have a full-time staffing position

dedicated to:

- Providing one-on-one counseling,
- Managing our referral network to ensure that we have working and trusted alliances with a wide variety of other health care related groups and health care providers, and
- Working with other team members to set up and oversee our slate of customer activities.

To remove barriers to access for certain populations, we plan to offer the following free or reduced-cost services:

- Advocate Referrals. Critical to enabling access to health care will be providing customers with expert assistance in locating providers and getting necessary referrals. This service will be offered by our center to all customers free of charge.
- Substance Abuse and Misuse Counseling

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations

Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection,

warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

****Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.**

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs,

nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversions and Unsafe Practices

Any marijuana establishment agent who has:

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

Said employee shall be subject to immediate dismissal for any of the above infractions.

Marijuana Establishment's hours of operation and after-3 contact information.

Hours of Operation: Sunday-Wednesday 8:30 a.m.- 10:00 p.m. (11:00 pm Thurs-Sat)

Contact Info: David Mech 1 Crescent Hill Springfield, MA 01105 413-883-3471

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of

electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

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;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids.

Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited

during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

(1) The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

- (2) The Marijuana Establishment shall maintain the results of all testing for no less than one year;
- (3) The sale of seeds is not subject to these testing provisions.
- (4) Clones are subject to these testing provisions, but are exempt from testing for metals.
- (5) All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).
- (6) All storage of marijuana at a laboratory providing marijuana testing services

shall comply with 935 CMR 500.105(11);

(7) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and

(8) No marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Employees

Eddie's Flowers, Inc. will initially staff its facility with approximately twenty on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), a Customer Services Associate (4), Budtenders (13), and Security Associates (2).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment,

verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21 and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) that will demonstrate accessible business hours and safe cultivation conditions;

Personnel policies and procedures; and

All background check reports obtained in accordance with 935 CMR 500.030.

Business records, which shall include manual or computerized records of:

Assets and liabilities;

Monetary transactions;

Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

Sales records including the quantity, form, and cost of marijuana products; and

Salary and wages paid to each employee, 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.

Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a

secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and

sanitizing preparations and sanitary towel service or suitable drying devices;

- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment.
- Plumbing shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;

- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21. Additionally we may build a power plant if demand requires.

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;

We will display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases will be transparent. We will also

remove a sample of marijuana from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample unless otherwise authorized herein.

The establishment will post prices in the store and may respond to questions about pricing on the phone.

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

“This product may cause impairment and may be habit forming.”

“Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug.”

“There may be health risks associated with consumption of this product.”

“For use only by adults 21 years of age or older. Keep out of the reach of children.”

“Marijuana should not be used by women who are pregnant or breastfeeding.”

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

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;

- advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data; Eddie's Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;
- advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, coupons, or "free" or "donated" marijuana;
- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;
- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
- advertising, marketing or branding of marijuana products, on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty

items and similar portable promotional items;

- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- signs or other printed matter advertising any brand or kind of marijuana product that are displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale;
- advertising or marketing of the price of marijuana products, except that Eddie's Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.

- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.

5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child- resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.
12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.
13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.
14. All vehicles and transportation equipment used in the transportation of cannabis products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the cannabis products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

(b) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.
2. Marijuana establishment agents shall report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

(c) Vehicles.

1. A vehicle used for transporting marijuana products must be:
 - a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;
 - b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);
 - c. equipped with an alarm system approved by the Commission; and
 - d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.
2. Marijuana products must not be visible from outside the vehicle.
3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.
4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.
5. No firearms may be located within the vehicle or on a marijuana establishment agent

(d) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.
2. The storage compartment must be sufficiently secure that it cannot be easily removed.
3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.
4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(e) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana

- Transporter during transport of marijuana products; and
- d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.
2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
 3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
 4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
 5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
 6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
 7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
 8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.
2. Prior to transport, the manifest shall be securely transmitted to the

destination Marijuana Establishment by facsimile or email.

3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- a. the originating Marijuana Establishment name, address, and registration number;
- b. the names and registration numbers of the agents who transported the marijuana products;
- c. the name and registration number of the marijuana establishment agent who prepared the manifest;
- d. the destination Marijuana Establishment name, address, and registration number;
- e. a description of the marijuana products being transported, including the weight and form or type of product;
- f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
- g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- j. the weight and inventory before departure and upon receipt;
- k. the date and time that the transported products were re-weighed and re-inventoried;
- l. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
- m. the vehicle make, model, and license plate number.

4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the

marijuana establishment agent will operate for the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(2) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;

2. Representatives of other state agencies of the Commonwealth; and

3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

(3) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

(a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;

(b) 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;

(c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use

a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volitile Orgornic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

1. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
2. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.
3. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter

by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.

4. Our Cultivation building exterior is sealed with an airlock entry, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

(1) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.

(2) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(3) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(4) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(5) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

(1) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.

(2) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

(3) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.

(4) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

500.140: Additional Operational procedures for Retail Sale

- (1) Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, a Marijuana Retailer may not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.
- (2) Unauthorized Sales and Right to Refuse Sales.
- (a) Eddie's Flowers, Inc. agents shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.
 - (b) Eddie's Flowers, Inc. agents may refuse to sell marijuana products to a consumer if, in the opinion of the marijuana establishment agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.
 - (c) Eddie's Flowers, Inc. Agents shall not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.
 - (d) Eddie's Flowers, Inc. and its agents is prohibited from selling marijuana products containing nicotine.
 - (e) Eddie's Flowers, Inc. is prohibited from selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.
- (3) Recording Sales.
- (a) Eddie's Flowers, Inc. is using METRC.
 - (b) Eddie's Flowers, Inc. is prohibited from utilizing software or other methods to manipulate or alter sales data.
 - (c) Eddie's Flowers, Inc. shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a retailer determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
 - 1. it shall immediately disclose the information to the Commission;
 - 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - (d) Eddie's Flowers, Inc. shall comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.
 - (e) A retailer shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

(4) Consumer Education. A Marijuana Retailer shall make available educational materials about marijuana products to consumers. A retailer must have an adequate supply of current educational material available for distribution. Educational materials must be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials shall be made available for inspection by the Commission upon request. The Commission will establish fines or other civil penalties for a Marijuana Establishment's failure to provide these materials. The educational material must include at least the following:

- A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;
 - Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
 - Materials offered to consumers to enable them to track the strains used and their associated effects;
 - Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
- A discussion of tolerance, dependence, and withdrawal;
 - Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
- A statement that consumers may not sell marijuana to any other individual;
 - Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law; and
- Any other information required by the Commission.

(9) Testing. No marijuana product, including marijuana, may be sold by Eddie's Flowers, Inc., or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Timeline

Eddie's Flowers, Inc. is negotiating relationships with several cultivation and manufacturing establishments to obtain product at wholesale prices, until their facilities are constructed and licensed. We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

Eddie's Flowers, Inc. has a CHA with the Town of Ashburnham

Limiting Access To Over 21

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- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;
- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include: of the following:

- Driver's License
- Government-issued ID card
- Military ID card

○
Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, only then will they have been granted access to the building.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. is looking into implementing solar power to produce supplemental power and energy efficiency.

We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency.

Energy storage will be utilized from excess solar power generation.

We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21, including, but not limited to weatherproofing and updating of lighting etc.

Renovations will need to comply with current energy code regarding efficiency options like improved lighting and increasing exterior envelope R value. We are working on that. We are retaining an MEP engineer about load management storage, etc. We intend to insulate the roof, which has minimum insulation at this point.

We will be incorporating energy saving lighting to reduce demand as well as upgrading restroom fixtures to reduce water demand.. For the HVAC, we will have a mini-split operating off a heat pump for the vault – those are extremely efficient and worth noting.

Personnel Policies

Eddie's Flowers policy is to provide meaningful opportunities for minorities and women in the retail marijuana and other marijuana related businesses. We also plan on conducting an internship program with colleges and universities, developing a source of trained entrants into the Cannabis industry.

Employees must undergo state-mandated criminal history background checks as a condition of their employment. This background check, and a more extensive national background check, will cover the entire United States, criminal and civil.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

**Only authorized establishment agents who have been trained on privacy and

recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

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

Said employee shall be subject to immediate dismissal for any of the above infractions.

Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

STAFFING PLAN

Employees and Job Descriptions

Eddie's Flowers, Inc. will initially staff its facilities with 15-20 on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), Customer Services Associates (3), Budtenders (13), and Security Associates (3). Employees will receive a minimum of 8 hours per year of training, as outlined elsewhere in this application.

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment, verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21, or current registered patients over 18, carrying a valid registration card, and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities

- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of

the incident. This includes reporting the incidents to local law enforcement.

Personnel records:

Personnel records for each Marijuana Establishment Agent shall be maintained. 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:

- a. All materials submitted to the commission pursuant to 935 CMR 500.030(2);
- 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 Marijuana Establishment Agents required under 935 CMR 500.105(2).

Alcohol, smoke, and drug-free workplace policies. 935 CMR 500.105(1)

The Establishment shall be alcohol, smoke and drug-free. There shall be no smoking in the establishment and its environs.

Eddie's Flowers has a zero tolerance policy for alcohol consumption on the premises. In addition this policy extends to employees that arrive under the influence of alcohol. If a manager suspects an employee is under the influence of alcohol or illegal drugs, the employee's employment will be immediately suspended, and the employee will be given the opportunity to obtain counseling/rehab. Upon the successful completion of same, the employee will undergo a re-entry evaluation, and will be allowed to rejoin the staff upon a "successful" evaluation.

Confidential information. 935 CMR 500.105(1)

Eddie's Flowers will not acquire or record a customer's personal information, other than information typically required in a retail transaction, which can include identifying information to determine a customer's age. Eddie's Flowers will not record or retain any additional personal information from a consumer without the customer's voluntary written permission.

Code of ethics

Policy

As a matter of Company policy, we hereby provide this Code of Ethics and Business Conduct. It effectively serves as a guide to acceptable business conduct for all employees. Because they represent the Company and our brand, we expect everyone who works for us to demonstrate exemplary standards of ethics and integrity. Therefore, our employees must therefore abide by the following principles.

Foster Trust and Belief

We cannot succeed as a business without the trust and confidence instilled in our employees, customers and shareholders. We earn it by keeping our promises, acting with honesty and integrity and reaching company goals solely through proper conduct.

Accordingly, the key question to ask in any decision-making process is: will this establish or enhance trust and belief in our business? Will it create an atmosphere conducive to ongoing positivity and success? Will I be able to deliver what I've promised without sacrificing quality or compromising my personal and professional integrity? Remember, the only way to build upon existing trust and belief in our business is with affirmative answers to all of these questions.

Foster Respect in the Workplace

As a business predicated on fairness and positivity, we believe an effective workplace can only exist when employees are fully committed to treating one another with respect. Furthermore, as an equal employment/affirmative action employer, we are compelled to provide a workplace devoid of discrimination and/or abusive, offensive or harassing conduct. Any employee who experiences harassment or discrimination should report the matter to his or her direct supervisor or to someone in Human Resources.

Foster Constructive Dialogue and a Forum Where Employees Can Freely Voice Concerns

We equate effective communication with respect. We also believe that any employee should feel free to voice any concern about work-related matters without fear of reprisal. This means that it is up to any employee in a supervisory position to establish and maintain an atmosphere conducive to open and honest communication. The company is responsible for the comprehensive investigation of any reported matter pertaining to questionable or unethical behavior. Appropriate action will be taken in any and all cases where there is a valid finding of wrongful conduct. All employees should also be aware that intimidation, attempted intimidation and/or retaliation (attempted

or otherwise) against a co-worker who has reported alleged wrongdoing is unacceptable and will be dealt with accordingly.

Lead by Example

Hypocrisy at any level is unacceptable. This means we hold our leaders (our officers/executives, directors and upper and middle management) to the same standards as any other employees. We therefore expect their conduct to reflect their belief in and willingness to abide by this Code. Any failure to do so on their part will be dealt with accordingly.

Code of Ethics and Business Conduct

This Code is only effective as long as: designated supervisory personnel use applicable policies and procedures to facilitate the resolution of any ethical questions or concerns brought to their attention. Therefore, reports raising any such questions or concerns should not be viewed as anything other than a valid form of workplace communication and welcomed as such.

Compliance with all Applicable Policies and Laws

Compliance with all applicable local, state, federal and foreign laws is a fundamental aspect of our commitment to integrity. An individual understanding of relevant company policies, laws, rules and regulations is also required. Accordingly, any employee with doubts about whether potential action complies with applicable law or Company policy should not take any action without obtaining the advice of a relevant expert. Each and every employee is responsible for preventing and reporting violations or potential violations.

Competition

Principled competition is the lifeblood of a free market economy. Therefore, we welcome and pledge to engage in such competition. This means our products and services will only be sold based on factors deemed fair and reasonable given applicable market conditions. This also means we will not engage in any collusion, conspiracy or any other inappropriate/illicit practices with regards to pricing. Finally, we will not offer to make or request unlawful payments or similar recompense in return for the purchase of our goods or the sales of its products or services.

Proprietary Information

We will abide by all applicable laws, rules and regulations pertaining to the acquisition and use of Intellectual Property. Specifically, we will not obtain or try to obtain a competitor's trade secrets or other proprietary or confidential information; nor will we condone or participate in improper use, copying, distribution or alteration of software or other intellectual property.

Safeguarding Inside Information

The deliberate or inadvertent disclosure in any forum of any inside information regarding the company, its business practices, strategies, financial status, operational results or similar information is strictly prohibited. Employees tasked with crafting presentations or proposals should be especially mindful of these restrictions.

Avoid Conflicts of Interest

Any and all relationships or activities that actually compromise or could potentially compromise any employee's fairness or objectivity should be avoided. In this context, professional integrity is paramount. This means that use of company property or information for personal gain is strictly prohibited.

It is sometimes difficult to determine whether certain activity constitutes a conflict of interest. Any employee with doubts about whether certain conduct actually is or could be construed, as conflict of interest should consult a supervisor before taking any action.

Accepting Professional Courtesies

It is not unusual for professional courtesies to be extended to company employees from time to time. However, such courtesies should not be expected and requesting them is strictly forbidden. Although there is no prohibition against the occasional acceptance of unsolicited professional courtesies, employees should not feel obligated to accept them. Employees in key decision-making positions should be wary of accepting any professional courtesy that could potentially or actually have an unfavorable impact on our reputation. If any employee feels uncomfortable accepting or has any misgivings about accepting a professional courtesy, the best course of action is to decline politely.

Meals, Refreshments Entertainment and Gifts

There is no prohibition against the acceptance of occasional meals, refreshments, entertainment, gifts and similar business courtesies that are commonplace and as such fall within conventional norms as long as:

- They are not too extravagant.
- The acceptance of such courtesies from any one person, organization or business is not habitual.
- Any such courtesies are not offered or do not appear to be offered in exchange for any business "favors" of any kind.
- The acceptance of any such courtesy would not cause the employee to feel uncomfortable about disclosing it to his or her supervisor, or with public disclosure.

Ordinary business entertainment is also acceptable; however, professional misconduct occurs when the value or cost of such entertainment creates or could potentially create a conflict of interest.

Questions about the acceptance of any business courtesies should be directed to your direct supervisor, manager or to the Human Resources department.

Offering Professional Courtesies

In the routine course of business, it is not unusual to offer professional courtesies. Making such offers is acceptable as long as it is not done, or cannot be perceived as being done to curry favor with or otherwise influence the recipient. The use of personal funds or resources within this context is expressly prohibited. Accounting for business courtesies should comply with approved company procedures.

The gifting of certain promotional items is generally acceptable, as long as such activity complies with acceptable professional norms. Employees with questions or concerns about such activity should consult their direct supervisor or manager. The approval of other courtesies such as meals, refreshments or entertainment of reasonable value, will be granted as long as:

- The activity does not violate or appear to violate any applicable laws, rules, regulations or standards of conduct.
- The professional courtesy conforms to applicable norms, is only offered occasionally and is not excessive.

- The professional courtesy is properly documented.

Truthful Public Disclosures

We will ensure that any and all financial information made available to the investing and general public in any format is truthful, timely and fully explained. This obligation applies to all employees from the CFO down, who are in any way responsible for the preparation of such information. Any inadvertent or deliberate inaccuracy in or falsification of such information is unacceptable; and any concerns about the veracity or accuracy of such material should be immediately directed to the compliance officer.

Corporate Recordkeeping

We create, retain and dispose of our official documents as part of our normal course of business in accordance with applicable company policies and procedures; and in compliance with all regulatory and legal requirements.

All corporate records must be factual, exact and absolute, and company data must be promptly and accurately documented in our books in accordance with all relevant internal and external accounting practices.

We must not unduly affect, influence or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of company records, processes or internal controls.

Accountability

Each and every employee must familiarize himself or herself with this Code and act accordingly. Each and every employee is ethically obligated to ask questions if he or she is unsure of company policy. Each and every employee is ethically obligated to contact the Human Resources department if he or she has any concerns about compliance with or violations of this Code. The values and principles included herein are taken seriously, and violations are cause for disciplinary action up to and including termination of employment.

Protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners is key to our success. This includes but is not limited to pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. The disclosure of such information without a valid business or legal purpose and proper authorization is not permitted and will not occur under any circumstances.

Use of Company Assets

Company assets, including time, material, equipment and information, are provided for professional use. There is no prohibition of occasional personal use as long as it is not disruptive and does not harm job performance. Employees and those who represent the company are entrusted with responsible use of such material. Managers are responsible for the material assigned to their departments and are empowered to resolve issues concerning its proper use.

Generally, the use of company equipment such as computers, copiers and fax machines for outside business purposes or in support of any religious, political or other outside daily activity is not permitted. Distribution of information or material not relevant to the company, its products or services, by any employee in work areas or during work hours is not allowed.

In order to protect the interests of the company and our employees, we reserve the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or company intranet. Use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate is prohibited.

Compliance

Because it is crucial to the company's success, compliance with these values is mandatory. Our Compliance Team is tasked with ensuring that all employees are aware of, understand and abide by these principles. Supervisory personnel are also tasked with ensuring that their subordinates abide by the principles set forth in this Code. The board is authorized to review compliance, and audits will be authorized as necessary. Employees are ethically obligated to report any violations or suspected violations of this Code to management's attention; and provisions for confidential reporting have been made.

Whistle-blower policy

A policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations; and

Qualification and Training

STAFFING PLAN

Employees and Job Descriptions

Eddie's Flowers, Inc. will initially staff its facilities with 15-20 on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), Customer Services Associates (3), Budtenders (13), and Security Associates (3). Employees will receive a minimum of 8 hours per year of training, as outlined elsewhere in this application.

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment, verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21, or current registered patients over 18, carrying a valid registration card, and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner,

while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Personnel records:

Personnel records for each Marijuana Establishment Agent shall be maintained. 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;
- 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 Marijuana Establishment Agents required under 935 CMR 500.105(2).

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations

Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

**Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Anticipated positions and their qualifications.935 CMR 500.105

All current owners, managers, and employees shall complete the Responsible Vendor Program after July 1, 2019 or when available. 935 CMR 500.105(2)

All new employees shall complete the Responsible Vendor Program within 90 days of being hired. 935 CMR 500.105(2)

Responsible Vendor Program documentation must be retained for four (4) years. 935 CMR 500.105(2)

Eddie's Flowers will ensure that all employees hired to work at a Eddie's Flowers facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

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

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

Training As required by 935 CMR 500.105(2), and prior to performing job functions, each of Eddie's Flowers's agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Training Program and eight (8) hours of on-going training annually.

All of Eddie's Flowers's current Owners, managers, and employees that are involved in the handling and sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of three (3) hours of required training to marijuana establishment agents to be designated a "Responsible Vendor". Once Eddie's Flowers is designated a "Responsible Vendor", all new employees involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program within 90 days of the date they are hired. After initial successful completion of a Responsible Vendor Training Program, each Owner, manager, and employee involved in the handling and sale of marijuana will successfully complete the program once every year thereafter to maintain designation as a "Responsible Vendor".

Eddie's Flowers will also encourage administrative employees who do not handle or sell marijuana to take the "Responsible Vendor" program on a voluntary basis to help ensure compliance. Eddie's Flowers's records of Responsible Vendor Training Program compliance

will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

As part of the Responsible Vendor Training Program, Eddie's Flowers's agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

3. Marijuana's effect on the human body, including:

- Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
- The amount of time to feel impairment;
- Visible signs of impairment; and
- Recognizing signs of impairment

4. Diversion prevention and prevention of sales to minors, including best practices;

5. Compliance with all tracking requirements;

6. Acceptable forms of identification, including:

- How to check identification;
- Spotting false identification;
- Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission; and
- Common mistakes made in verification

7. Other key state laws and rules affecting Owners, managers, and employees, including:

- Local and state licensing and enforcement;
- Incident and notification requirements;

- Administrative and criminal liability;
- License sanctions;
- Waste disposal;
- Health and safety standards;
- Patrons prohibited from bringing marijuana onto licensed premises;
- Permitted hours of sale;
- Conduct of establishment;
- Permitting inspections by state and local licensing and enforcement authorities;
- Licensee responsibilities for activities occurring within licensed premises;
- Maintenance of records;
- Privacy issues; and
- Prohibited purchases and practices.

Operating Policies and Procedures (Maintenance of Financial Records Plan)

The retailer is prohibited from utilizing software or other methods to manipulate or alter sales data. 935 CMR 500.140(6) (required for retail only)

Eddie's Flowers, the retailer, shall conduct a monthly analysis of equipment determine that no software has been installed that could be utilized to manipulate or alter sales data. 935 CMR 500.140(6) (required for retail only)

The retailer shall maintain records that it has performed the monthly analysis. 935 CMR 500.140(6) (required for retail only)

If the retailer determines that software or other methods have been installed/utilized to manipulate or alter sales data: it shall immediately disclose the information to the Commission, cooperate in any investigation, and take such other action directed by the Commission. 935 CMR 500.140 (required for retail only)

The retailer shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements. 935 CMR 500.140(6)

The retailer shall adopt separate accounting practices at the point-of-sale for marijuana and non-marijuana sales. 935 CMR 500.140(6) (required for retail only)

Operating Policies and Procedures (Record Keeping Procedures)

Establishments shall keep these waste records for at least three years. 935 CMR 500.105(12)

Establishments shall maintain their records in accordance with generally accepted accounting principles. 935 CMR 500.105(9)5

Written operating procedures shall be maintained as required by 935 CMR 500.105(1). 935 CMR 500.105(9)

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Ensuring that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area. 935 CMR 500.105(3) (required for cultivators, product manufacturers, microbusiness, and craft marijuana cooperatives)

All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000.

Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

- Maintaining adequate personal cleanliness; and
- Washing hands appropriately. 935 CMR 500.105(3)

Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands. 935 CMR 500.105(3)

There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations. 935 CMR 500.105(3)4

Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests. t to 935 CMR 500.105(12). 935 CMR 500.105(3) Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair. 935 CMR 500.105(3)

All contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. 935 CMR 500.105(3).

All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana. 935 CMR 500.105(3)

Water supply shall be sufficient for necessary operations. 935 CMR 500.105(3)

Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. 935 CMR

500.105(3)

The establishment shall provide its employees with adequate, readily accessible toilet facilities. 935 CMR 500.105(3)

Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination. 935 CMR 500.105(3)

Diversity

Eddie's Flowers will provide opportunities, service, and programming that will promote access into the cannabis industry to Commission- approved diverse populations (Minorities; Women; Veterans; People with disabilities; and LGBTQ+).

Program-Job Creation

Eddie's Flowers intends to hire:

50% women,
50% minorities, including Blacks, African Americans, Latinos, and Indigenous people.
30% Veterans,
10% LGBTQ, and
10% People with disabilities.

We will advertise in the local newspapers at least once per month, seeking minorities, women, and those who those with disabilities. They include the Gardner News, Fitchburg Sentinel and Enterprise, Worcester Telegram, and Spencer New Leader newspapers, stating that the establishment is specifically looking for women, minorities, or persons with disabilities to work for the establishment.

We will target the following Worcester Census Tracts, along with the Fitchburg and Spencer areas.

Census Tract 7314

Census Tract 7313

Census Tract 7317

Census Tract 7315

Census Tract 7325

Census Tract 7312.03

Census Tract 7320.01

We will also target (Minorities Black, African Americans, Latino, Women, Veterans, and People with disabilities; and LGBTQ+) during quarterly informational seminars, in order to seek out and provide employment opportunities to Commission-approved diverse populations.

Measurements/Metrics

Number of employees hired, retained, or promoted that come from each of the groups of people previously identified in this guidance; number/percentage of previously identified employees in total, compared to total number of individuals hired to ensure the percentage individuals hired achieve the stated goals:

50% women,
50% minorities,
30% Veterans,
10% LGBTQ, and
10% People with disabilities.

Measurements will be conducted quarterly, with an annual summary provided during renewal.

Program 2- Business Mentoring/Funding

Eddie's Flowers owner, David Mech, is founder of Fist Aid for our Troops, which has held benefit concerts "First Aid", since 2007. The first concert (featuring Jefferson Starship) was held in July of 2007, in Northampton MA, (the birthplace of Veterans' benefits), at the fairgrounds, to raise awareness of Veteran's benefits, or lack thereof. First Aid, Inc. has expanded their targeted clientele, in the field of Cannabis business development, and works with all of the following diverse populations:

Women,
Minorities,

Veterans,
LGBTQ, and
People with disabilities.

Eddie's Flowers will work with First Aid in a program designed to achieve the goal of enabling the above listed to start their own Cannabis related business.

An annual First Aid concert will be held in Northampton, MA, the first being held in November, 2022.

All proceeds will go to the program, which will assist said impacted individuals with capital, and guidance to achieve their cannabis related goals and dreams. Information will be provided at the concert to educate these groups regarding opportunities in the Cannabis Industry.

In addition to the concert, Eddie's Flowers will hold quarterly seminars at it's facility in Ashburnham hosting diverse populations listed above, and their families, to tour our facilities, and learn about the opportunities that await in the Cannabis industry.

We will offer guidance in all areas, including retail, delivery, manufacturing and cultivation, with an emphasis on instruction on "white labeling" original products with established manufacturing business. Together, with funding obtained through the First Aid concert, we can provide said diverse individuals and groups, with a realistic opportunity to be self-sufficient.

We will advertise for these seminars in the Fitchburg Sentinel and Enterprise, Worcester Telegram, and Spencer New Leader newspapers.

We will target the following Worcester Census Tracts along with the Fitchburg and Spencer areas.

Census Tract 7314

Census Tract 7313

Census Tract 7317

Census Tract 7315

Census Tract 7325

Census Tract 7312.03

Census Tract 7320.01

Metrics

Number of businesses created by members of the above diverse populations, compared to the total of known Cannabis related businesses owned by members of the above-listed diverse populations.

Eddie's Flowers 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.