



# Massachusetts Cannabis Control Commission

## Marijuana Courier

### General Information:

License Number: D0100106  
Original Issued Date: 10/09/2020  
Issued Date: 11/18/2021  
Expiration Date: 11/20/2022

## MARIJUANA COURIER PRE-CERTIFICATION NUMBER

Marijuana Courier Pre-Certification Number:

## ABOUT THE MARIJUANA COURIER LICENSEE

Business Legal Name: Frozen 4 Corporation

Phone Number: 617-990-6653 Email Address: licenses@budmarys.com

Business Address 1: 24 William Way Business Address 2:

Business City: Bellingham Business State: MA Business Zip Code: 02019

Mailing Address 1: 8 Bayridge Lane Mailing Address 2:

Mailing City: Duxbury Mailing State: MA Mailing Zip Code: 02332

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

## PERSONS HAVING DIRECT OR INDIRECT CONTROL

### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 51 Percentage Of Control: 51

Role: Executive / Officer Other Role:

First Name: Candace Last Name: Kattar Suffix:

Gender: Female User Defined Gender:

What is this person's race or ethnicity?: Middle Eastern or North African (Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian)

Specify Race or Ethnicity:

### Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control:

Role: Owner / Partner Other Role: Executive with partner entity

First Name: Benjamin Last Name: Virga Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:



### Person with Direct or Indirect Authority 3

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

### Person with Direct or Indirect Authority 4

Percentage Of Ownership:	Percentage Of Control:	
Role: Owner / Partner	Other Role: Executive with partner entity	
First Name: Lukasz	Last Name: Marut	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 HAVING DIRECT OR INDIRECT CONTROL

### Entity with Direct or Indirect Authority 1

Percentage of Control: 49	Percentage of Ownership: 49	
Entity Legal Name: Bud & Mary's, LLC	Entity DBA:	DBA City:
Entity Description: partner Company		
Entity Website:		
Foreign Subsidiary Narrative:		
<p><b>Relationship Description:</b> Bud &amp; Mary's, LLC is the partner company of Frozen 4 Corporation, a licensing entity, to pursue adult use cannabis licenses within Massachusetts. Candace Kattar, a certified Economic Empowerment Applicant, owns and controls 51% of Frozen 4 Corporation while Bud &amp; Mary's, LLC owns and controls 49%. Bud &amp; Mary's, LLC will also be the main capital contributor to Frozen 4 Corporation. Benjamin Virga, David Morgan &amp; Lukasz Marut are the three executives from Bud &amp; Mary's, LLC designated to operate this license with Frozen 4 Corp.</p>		

## CAPITAL RESOURCES - INDIVIDUALS

No records found

## CAPITAL RESOURCES - ENTITIES

### Entity Contributing Capital 1

Entity Legal Name: Bud & Mary's, LLC	Entity DBA:		
Email: bvirga@frozen4llc.com	Phone: 617-990-6653		
Address 1: 1801 North American Street	Address 2: #2A		
City: Philadelphia	State: PA	Zip Code: 19122	
Types of Capital: Monetary/Equity, Debt	Other Type of Capital:	Total Value of Capital Provided: \$16500	Percentage of Initial Capital: 10
Capital Attestation: Yes			

## BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

## DISCLOSURE OF INDIVIDUAL INTERESTS

### Individual 1

First Name: Candace	Last Name: Kattar	Suffix:
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<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Product Manufacture
<b>Marijuana Establishment City:</b> Marshfield	<b>Marijuana Establishment State:</b> MA

Individual 2

<b>First Name:</b> Candace	<b>Last Name:</b> Kattar	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Marshfield	<b>Marijuana Establishment State:</b> MA	

Individual 3

<b>First Name:</b> Candace	<b>Last Name:</b> Kattar	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Transporter with Other Existing ME License	
<b>Marijuana Establishment City:</b> Bellingham	<b>Marijuana Establishment State:</b> MA	

Individual 4

<b>First Name:</b> Candace	<b>Last Name:</b> Kattar	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Bellingham	<b>Marijuana Establishment State:</b> MA	

Individual 5

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Bellingham	<b>Marijuana Establishment State:</b> MA	

Individual 6

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Transporter with Other Existing ME License	
<b>Marijuana Establishment City:</b> Bellingham	<b>Marijuana Establishment State:</b> MA	

Individual 7

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Product Manufacture	
<b>Marijuana Establishment City:</b> Marshfield	<b>Marijuana Establishment State:</b> MA	

Individual 8

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4 Corporation	<b>Business Type:</b> Marijuana Retailer	
<b>Marijuana Establishment City:</b> Marshfield	<b>Marijuana Establishment State:</b> MA	

Individual 9

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Bud and Mary's Cultivation Inc	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Bellingham	<b>Marijuana Establishment State:</b> MA	

Individual 10

<b>First Name:</b> Benjamin	<b>Last Name:</b> Virga	<b>Suffix:</b>
<b>Marijuana Establishment Name:</b> Frozen 4, LLC	<b>Business Type:</b> Marijuana Cultivator	
<b>Marijuana Establishment City:</b> Berkley	<b>Marijuana Establishment State:</b> MA	

Individual 11

<b>First Name:</b> David	<b>Last Name:</b> Morgan	<b>Suffix:</b>
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**Marijuana Establishment Name:** Bud & Mary's Cultivation Inc      **Business Type:** Marijuana Cultivator

**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

**Individual 12**

**First Name:** David      **Last Name:** Morgan      **Suffix:**

**Marijuana Establishment Name:** Frozen 4, LLC      **Business Type:** Marijuana Cultivator

**Marijuana Establishment City:** Berkley      **Marijuana Establishment State:** MA

**Individual 13**

**First Name:** David      **Last Name:** Morgan      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Product Manufacture

**Marijuana Establishment City:** Marshfield      **Marijuana Establishment State:** MA

**Individual 14**

**First Name:** David      **Last Name:** Morgan      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Retailer

**Marijuana Establishment City:** Marshfield      **Marijuana Establishment State:** MA

**Individual 15**

**First Name:** David      **Last Name:** Morgan      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Product Manufacture

**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

**Individual 16**

**First Name:** David      **Last Name:** Morgan      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Transporter with Other Existing ME License

**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

**Individual 17**

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**

**Marijuana Establishment Name:** Bud & Mary's Cultivation Inc      **Business Type:** Marijuana Cultivator

**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

**Individual 18**

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**

**Marijuana Establishment Name:** Frozen 4, LLC      **Business Type:** Marijuana Cultivator

**Marijuana Establishment City:** Berkley      **Marijuana Establishment State:** MA

**Individual 19**

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Product Manufacture

**Marijuana Establishment City:** Marshfield      **Marijuana Establishment State:** MA

**Individual 20**

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**

**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Retailer

**Marijuana Establishment City:** Marshfield      **Marijuana Establishment State:** MA

**Individual 21**

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**



**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Product Manufacture  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

#### Individual 22

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**  
**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Transporter with Other Existing ME License  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

#### Individual 23

**First Name:** Candace      **Last Name:** Kattar      **Suffix:**  
**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

#### Individual 24

**First Name:** Benjamin      **Last Name:** Virga      **Suffix:**  
**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

#### Individual 25

**First Name:** David      **Last Name:** Morgan      **Suffix:**  
**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

#### Individual 26

**First Name:** Lukasz      **Last Name:** Marut      **Suffix:**  
**Marijuana Establishment Name:** Frozen 4 Corporation      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Bellingham      **Marijuana Establishment State:** MA

### MARIJUANA COURIER LICENSEE PROPERTY DETAILS

**Establishment Address 1:** 24 William Way      **Establishment Address 2:**  
**Establishment City:** Bellingham      **Establishment Zip Code:** 02019  
**Approximate square footage of the establishment:** 16000      **How many abutters does this property have?:** 19  
**Have all property abutters been notified of the intent to open a Marijuana Courier Licensee at this address?:** Yes

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	24 William Way CCC cert form for HCA dated 7 13 20.pdf	pdf	5f15ba81a3272a742d1c264b	07/20/2020
Community Outreach Meeting Documentation	Virtual Community Meeting relation info for Delivery Only.pdf	pdf	5f32a9fbf4c60d645c964e4a	08/11/2020
Community Outreach Meeting Documentation	Recording of F4C's Virtual Community Meeting for Delivery Only.pdf	pdf	5f32aa01ca23a6644a588e04	08/11/2020
Community Outreach Meeting Documentation	Community Meeting Attestation form with related attachments revised for RFI #1 dated 8 13 20.pdf	pdf	5f3bd8935330a107b966be6b	08/18/2020
Plan to Remain Compliant with Local Zoning	Revised Plan to remain compliant with local zoning for RFI #1 dated 8 13 20.pdf	pdf	5f3bd8dc4fa1b607d3b5fe44	08/18/2020



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.: \$1

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Donation Acceptance Letter	Cook Family Charitable Foundation letter template 7 6 20.pdf	pdf	5f087d71fbd4df0a0ce2f0ff	07/10/2020
Donation Acceptance Letter	CCE letter accepting F4C donations 7 9 20.pdf	pdf	5f087d7272ae5809ead3eb5a	07/10/2020
Plan for Positive Impact	Revised Plan for Positive Impact for RFI #2 dated 8 18 20.pdf	pdf	5f3c16a2233f7b0865381609	08/18/2020

#### INDIVIDUAL BACKGROUND INFORMATION

##### Individual Background Information 1

Role: Other Role:  
First Name: Candace Last Name: Kattar Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

##### Individual Background Information 2

Role: Other Role:  
First Name: Benjamin Last Name: Virga Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

##### Individual Background Information 3

Role: Other Role:  
First Name: David Last Name: Morgan Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

##### Individual Background Information 4

Role: Other Role:  
First Name: Lukasz Last Name: Marut Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

##### Entity Background Check Information 1

Role: Partner Other Role:  
Entity Legal Name: Bud & Mary's, LLC Entity DBA:  
Entity Description: partner company and Capital Contributor  
Phone: 617-990-6653 Email: bvirga@budmarys.com  
Primary Business Address 1: 1801 N American Street Primary Business Address 2:



Primary Business City: Philadelphia Primary Business State: PA Principal Business Zip Code: 19122

Additional Information:

#### MASSACHUSETTS BUSINESS REGISTRATION

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	2021-10-26 Frozen 4 Corp Certertificate of Good Standing (1).pdf	pdf	617fea663982c731eb1c4af1	11/01/2021
Secretary of Commonwealth - Certificate of Good Standing	FROZEN 4 CORPORATION cert-sec of commonwealth.pdf	pdf	617fea6e44662a31f288e583	11/01/2021
Department of Unemployment Assistance - Certificate of Good standing	Frozen 4 Corporation Certificate of Compliance from Dept of Unemployment (1).pdf	pdf	617fea7286cf8531b41a1c3d	11/01/2021

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Amended and Restated Articles of Organization of F4C filed 6 25 20.PDF	pdf	5f03597757a0a16c3195fa4a	07/06/2020
Bylaws	F4C By Laws.pdf	pdf	5f0359837babe37ab6e4937b	07/06/2020

Massachusetts Business Identification Number: 001352375

Doing-Business-As Name:

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance .pdf	pdf	5ed7b9a1721f40180b7305fb	06/03/2020
Proposed Timeline	do100106 renewal timeline.pdf	pdf	617314185ca77d31bb6ae0d0	10/22/2021
Business Plan	business plan do100106 renewal (2).pdf	pdf	6173156799d47637982b697f	10/22/2021

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Diversity plan	REVISED_ Diversity Plan as of 762021.docx.pdf	pdf	6176b6a7d5b18b31d59906c8	10/25/2021
Energy compliance plan	Copy of Energy Compliance Plan for Delivery Only application.pdf	pdf	6176b71d703abe37a3aaeb96	10/25/2021
Delivery procedures (pursuant to 935 CMR 500.145)	Delivery Procedures .docx.pdf	pdf	6176c773d5b18b31d59907c4	10/25/2021
Dispensing procedures;inactive	Dispensing Procedures .docx.pdf	pdf	6176c80744662a31f288bf95	10/25/2021
Inventory	Inventory Procedures .docx.pdf	pdf	6176c9157c9a0537aea45d5c	10/25/2021



Maintenance of financial records	Plan for Maintaining of Financial Records.docx.pdf	pdf	6176c96f3982c731eb1c25a6	10/25/2021
Prevention of diversion	Prevention of Diversion .docx.pdf	pdf	6176ca5ad8c16731dcbdb57e	10/25/2021
A detailed description of qualifications and intended training(s) for Marijuana Establishment Agents who will be employees	Qualifications _ Intended Training for Marijuana Establishment Agents.docx (1).pdf	pdf	6176cb52d8c16731dcbdb590	10/25/2021
Record-keeping procedures	Record keeping procedures .docx.pdf	pdf	6176cb96e3155f31cafc8894	10/25/2021
Security plan	Security Plan.docx.pdf	pdf	6176ccb0084df83201bf5453	10/25/2021
Storage	Storage of Marijuana .docx.pdf	pdf	6176cf7e703abe37a3aaed17	10/25/2021
Personnel policies	Summary of Personnel Policies and Procedures MC .docx.pdf	pdf	6176cff77f037d37d69b6054	10/25/2021
Transportation	Transportation of Marijuana .docx.pdf	pdf	6176d06d51c4da37cbfb2c3e	10/25/2021
Procedures for quality control and testing of product for potential contaminants	Quality Control and Testing Procedures .docx.pdf	pdf	6176d0fb5ca77d31bb6ae673	10/25/2021

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

##### Progress or Success Goal 1

**Description of Progress or Success:** Frozen 4 Corporation (F4C) has revised and updated its Plan for Positive Impact. See attached. Once F4C has hired all staff necessary for operations, it will evaluate the new plan's successes or shortcomings and present to the CCC in a form and manner approved.

#### COMPLIANCE WITH DIVERSITY PLAN

##### Diversity Progress or Success 1

**Description of Progress or Success:** Frozen 4 Corporation (F4C) has revised and updated its Diversity Plan. See attached. Once F4C has hired all staff necessary for operations, it will evaluate the new plan's successes or shortcomings and present to the CCC in a form and manner approved.

#### HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 9:00 PM
Tuesday From: 9:00 AM	Tuesday To: 9:00 PM
Wednesday From: 9:00 AM	Wednesday To: 9:00 PM
Thursday From: 9:00 AM	Thursday To: 9:00 PM
Friday From: 9:00 AM	Friday To: 9:00 PM
Saturday From: 9:00 AM	Saturday To: 9:00 PM
Sunday From: 9:00 AM	Sunday To: 9:00 PM

#### 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 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 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.:

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 Agree

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 Agree

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

#### AGREEMENTS WITH MARIJUANA RETAILERS

##### Agreements with Marijuana Retailers 1

Owner First Name: Peter	Owner Last Name: Gallagher	Owner Suffix:
Marijuana Retailer Legal Name: I.N.S.A., Inc.	Marijuana Retailer DBA:	
Marijuana Retailer Description: INSA Salem, licensed Marijuana Retailer		
Marijuana Retailer Phone: 877-500-4672	Marijuana Retailer Email: info@myinsa.com	Marijuana Retailer Website:
Marijuana Retailer Address 1: 462 Highland Avenue		Marijuana Retailer Address 2:
Marijuana Retailer City: Salem	Marijuana Retailer State: MA	Marijuana Retailer Zip Code: 01970 Marijuana Retailer Country:
Marijuana Retailer Mailing Address 1: 122 Pleasant Street Easthampton,		Marijuana Retailer Mailing Address 2:
Marijuana Retailer Mailing City: Easthampton	Marijuana Retailer Mailing State: MA	Marijuana Retailer Mailing Zip Code: 01027 Marijuana Retailer Mailing Country:

#### MARIJUANA RETAILER AGREEMENT DOCUMENTATION

Supporting Document:

Document Category	Document Name	Type	ID	Upload Date
	F4C & Insa executed delivery agreement on 3 17 21.pdf	pdf	6172f44b7f037d37d69b594d	10/22/2021

#### AGREEMENTS WITH THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER

No records found

#### THIRD-PARTY TECHNOLOGY PLATFORM PROVIDER DOCUMENTATION

Supporting Document:

Document Category	Document Name	Type	ID	Upload Date
	2021-06-25 Executed Onfleet Agreement.pdf	pdf	61730d73703abe37a3aae79b	10/22/2021
	F4C executed agreement with Executel on 5 21 21.pdf	pdf	61730dbbd8c16731dcbda7f7	10/22/2021



## Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. 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(1).

### Applicant

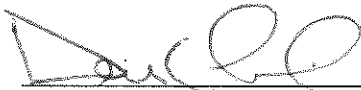
I, Benjamin C. Virga, (*insert name*) certify as an authorized representative of Frozen 4 Corporation (*insert name of applicant*) that the applicant has executed a host community agreement with Bellingham, MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 7/13/20 (*insert date*).



Signature of Authorized Representative of Applicant

### Host Community

I, Dennis C. Fraine, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Bellingham (*insert name of host community*) to certify that the applicant and Town of Bellingham (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on July 13th, 2020 (*insert date*).



Signature of Contracting Authority or  
Authorized Representative of Host Community

Town Administrator



**FROM: Frozen 4 Corporation**  
**TO: Cannabis Control Commission**  
**DATE: August 11th, 2020**  
**RE: Virtual Community Meeting related information**

Frozen 4 Corporation (F4C) held its community meeting for the residents of Bellingham to discuss the proposed Delivery Only Marijuana Establishment on Monday, August 10th at 7 PM. This came after F4C requested the Town of Bellingham's permission to do a Virtual Community Meeting and that request was granted by the Town Administrator in writing, a copy of which is included within this PDF. We did not need to do a test of the online meeting because we used the Town of Bellingham's municipal online platform via Zoom for the meeting and this platform is used multiple times per week by the Town so testing was not required to ensure it would work properly.

F4C followed all of the accessibility requirements, including the Americans with Disabilities Act (ADA) Accessibility Guidelines including closed captioning per the. We confirmed the fact with the meetings moderator, Town Planner James Kupfer, that this platform meets all of those required Accessibility Guidelines. This online platform also allowed for those in attendance to both ask and receive answers to questions during the actual meeting as overseen by Mr. Kupfer who was the meetings moderator.

The notices provided to the public for the meeting were all done in accordance with all CCC regulations and this is illustrated in our Community Meeting Attestation PDF uploaded with our application. F4C provided instructions on how to join and participate in the meeting in both the print advertisement taken out to notify residents of the meeting and the direct abutter letters sent out via certified mail. Those notices all specified how residents could submit any questions they may have prior to the meeting via email and the agenda for the meeting, which is included within this PDF, was posted on the Town of Bellingham's website along with the online access to the meeting.

The meeting had a total of two (2) residents of Bellingham attend, not including the Bellingham Town Officials and F4C members who also took part. The meeting was recorded by the Town of Bellingham and has been added to their website for future viewing by any interested residents who could not attend. The town has also provided F4C with an electronic copy of the meeting which has been uploaded as part of our application.





# TOWN OF BELLINGHAM

Bellingham Municipal Center  
10 Mechanic Street  
Bellingham, Massachusetts 02019  
Tel: 508-657-2802 Fax: 508-966-4425

Denis C. Fraine  
Town Administrator

Massachusetts Control Commission  
101 Federal Street 13<sup>th</sup> Floor  
Boston, MA 02110

Dear Commission,

Please be advised Frozen 4 LLC has requested and received permission from the Town of Bellingham to conduct their Community Meeting related to their delivery license, virtually. This request was granted in consideration of restrictions placed on public assembly do to COVID-19. This meeting will be conducted on the Town's Zoom platform and will be hosted by Town Planner, James Kupfer. This meeting has been posted on the Town's website along with an agenda and easy "one click" access to join the meeting. Additionally, the meeting will be recorded by the Town and archived on the Town's website with easy accessibility for future viewing.

In the event you require additional information relative to this matter please contact me directly.

Sincerely,

Denis C. Fraine  
Town Administrator

cc: Benjamin Virga Frozen 4





# BELLINGHAM

## Massachusetts

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## LINKS TO PUBLIC MEETING VIDEO CONFERENCING





When a Public Meeting will be broadcast via video conferencing, the information, including a link, will be provided below.

You may also call in via one of the numbers listed to listen to the meeting.

(Please note the Meeting ID as you will be required to enter this information when calling into the meeting)

These meetings will be offered via Zoom Video Conferencing Software.

[Click Here For More Information on using Zoom Video Conferencing Software](#)

[Click Here For previously recorded Meetings](#)

## Historical Commission Meeting

Monday, August 10, 2020

5:00pm

To attend the Meeting via Video Conference, click here: <https://zoom.us/j/91295737535?pwd=T3NMODIt-WjdwNldoSXJ3T3diczN6UT09>

Meeting ID: 912 9573 7535

Passcode: 02019

One tap mobile

+13126266799,,91295737535#,,,,,0#,,02019# US (Chicago) +19292056099,,91295737535#,,,,,0#,,02019# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)	+1 929 205 6099 US (New York)	+1 301 715 8592 US (Germantown)
+1 346 248 7799 US (Houston)	+1 669 900 6833 US (San Jose)	+1 253 215 8782 US (Tacoma)

Find your local number: <https://zoom.us/u/ajcgoDnjx>

Call to Order: Rick Marcoux, Chair

Minutes of the previous meeting

### Discussion topics

- Creation of Mission Statement Update
- Creation of Collection Policy Update
  - Update on Inventory
- Crimpville Comments Mailing List Update
- Fall Crimpville Comments Planning
  - Draft copy of revised Crimpville Comments newsletter
  - Discussion of purchasing Constant Contact for electronic newsletter



- 1950 Franklin Fire Engine Ladder owned by the Commission
- Discussion of Museum Renovation, Carpet, Painting and Lighting Plan
- RS Mile Marker Preservation and Promotion Update
- Update on Programs
  - July 20<sup>th</sup> The French Neutrals Program
  - Future programming planning

### Frozen Four Community Outreach Meeting

Monday, August 10, 2020

7:00pm

### MEETING AGENDA

*Next page  
downloaded from this site*

To attend the Meeting via Video Conference, click here: <https://us02web.zoom.us/j/85453142803>

Meeting ID: Meeting ID: 854 5314 2803

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Find your local number: <https://us02web.zoom.us/u/kbkFYzDpID>

### Housing Authority Meeting

Tuesday, August 11, 2020

6:00pm

To attend the Meeting via Video Conference, click here: <https://us02web.zoom.us/j/2854032644?pwd=T3UxVTBYWHhVM1NKTkpTSGwwSF1xUT09>

Meeting ID: Meeting ID: 285 403 2644

Passcode: 6ceriY

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+13126266799,,2854032644#,,,,,0#,,349320# US (Chicago)



# **FROZEN 4 CORPORATION**

## **Agenda for the virtual Community Meeting on Monday, Aug. 10th at 7 PM**

- Welcome and Introduction of the members of Frozen 4 Corporation participating in the virtual community meeting
- Overview of why the virtual community meeting is required.
- Overview of what a Delivery Only Marijuana Establishment does
- Overview of how this establishment proposed for 24 William Way in Bellingham can impact the Town and its residents
- Question & answer period with those attending the virtual community meeting as well as any questions submitted via email ahead of the meeting



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** August 11th, 2020  
**RE:** Copy of the Virtual Community Meeting for Delivery Only

The file size for the copy of the recording of Frozen 4 Corporations Online Community Meeting was too big to upload via the online portal. However, we have provided the link to the meeting can be found below for viewing purposes

<https://www.youtube.com/watch?v=Bv9HsuDxwYY>



## Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. 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(1).

I, Benjamin C. Virga, (insert name) attest as an authorized representative of Frozen 4 Corporation (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on August 10th, 2020 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on July 31st, 2020 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).
3. A copy of the meeting notice was also filed on July 20th, 2020 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on July 28th, 2020 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner 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. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).



5. Information was presented at the community outreach meeting including:
- The type(s) of Marijuana Establishment to be located at the proposed address;
  - Information adequate to demonstrate that the location will be maintained securely;
  - Steps to be taken by the 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 as defined by law.
6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.



# Attachment A

## NOTICE

In accordance with 935 CMR 500.000 et seq., notice is hereby given that a

### Community Outreach Meeting

for a proposed marijuana establishment is scheduled online for

**Monday, August 10, 2020 at 7PM.**

The online community meeting can be attended by going to the home page of the town of Bellingham website where it says "virtual public meetings" or by typing the following URL into your preferred web browser:

<https://www.bellinghamma.org/home/pages/inks-public-meeting-video-conferencing>

The proposed Delivery Only marijuana establishment is anticipated to be located at 24 William Way in Bellingham, MA.

There will be an opportunity for the public to ask questions during the virtual meeting, but the public may also ask questions in advance to be answered during the meeting.

Anyone wishing to ask questions in advance can email them to [info@frozentllc.com](mailto:info@frozentllc.com).

All questions received before 7 PM on Monday, August 10th, will be read and answered during the meeting.

#### For more information, please contact:

Bellingham Town Clerk's Office,  
10 Mechanic Street,  
Bellingham, MA 02019  
Tel: 508-657-2830  
Email: [townclerk@BellinghamMA.org](mailto:townclerk@BellinghamMA.org)

## Bellingham Business Owner & His Family Overcome Adversity

Like many people, local business owner Mike Welch is looking for ways to give back. His company, Metropoli-

tan Removal Company, Inc., has been in business for 25 years. While their focus on demolition, roll-off containers, and property cleanouts doesn't exactly lend itself to donations, in the wake of the current environ-

ment he and his sister Beth Lambert established a new "NYC Helping Communities Program." They hope to help local communities by giving away a gift card to a local restaurant, a local hardware store, a local hardware or retail store, or gas station every week (<https://www.facebook.com/metropolitanremoval>). They have also established two \$100 scholarships for college students, named the Edward H. and Mary M. Welch Memorial Scholarship after their parents.

With so many people struggling right now, we want to provide something that can help them right now," reads a recent Facebook post. Struggling is something the Welch family is experiencing. In 2006, Mike's older sibling Steve passed away from stomach cancer, and his illness led to the discovery of a genetic mutation shared by many family members.

"Right before he passed away, he knew there might be a genetic mutation, but he didn't know for certain," Beth said. The connection was made through their mother, Mary, who had undergone treatment for colon cancer. As she was wrapping up chemotherapy, an oncologist at Cape Cod Cancer Center in Hyannis, MA, as "signed ring cells," which are unusual, and referred the family to a genetic counselor at MGH.

The surgery, connecting the esophagus to the stomach, completely removes the stomach, presenting unique challenges related to eating and digesting food. In addition to the physical challenges, the siblings had their surgeries on the same day in 2007, and while living without a stomach has gotten easier with time, there are still times when both struggle.

"I was learning to eat all over again," she explained, noting that there's no one set of rules that work for everyone, one reason she wants to see more awareness and research. "It's gotten better in terms of the support and resources available, but it's still has days when she eats something and feels really sick, she doesn't complain about it. "It's the rate at which

adversity—continued on next page

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181 Main St.  
Blackstone, MA 01504  
**508-883-8000**  
[www.RyanLawOffice.com](http://www.RyanLawOffice.com)  
Christopher J. Ryan, Esq.

## ADVERSITY—continued from previous page

you eat, and the amount you eat. You learn what works only by eating and feeling sick or not feeling sick. Other side-effects included a fear of eating, nausea, and a rapid weight loss for both her and Beth. "I thought things were never a fun time for all three siblings. Pathology showed precancerous cells in all of them that would have become stomach cancer. Now the story continues with the next generation, to raise awareness of their genetic mutations—stomach cancer, Beth and Mike speak regularly at UMass Medical's Graduate School of Nursing, Brancatis University's Graduate Genetic Counseling Program, and most recently to students in the genetic counseling program at Mass General Hospital's Institute of Health Professionals.

"We talk about how complicated it is with a genetic condition, and how it's not always obvious, getting diagnosed with siblings. But then to find out that there's a genetic component and your diagnosis really becomes a diagnosis for everyone in your family possibly. At this point, over ten years later, all but one of the next generation have been tested. While Beth and her siblings received their diagnosis after having established their lives, the next generation knows from a young age, but that hasn't stopped them. Beth and her siblings have been careful not to be alarmists.

"We never made it a big deal," she said. "We weren't alarmists about it, and that has helped her hold onto hope. We had such an appreciation for how lucky we were to have our particular mutation and a hard time seeing the luck in the situation. Beth points out that in any times of crisis, it's all about perspective and not taking things for granted."

"When you go through something like that, hopefully it gives you perspective on what's important," she said. Ten years later, she is thankful for

the medical intervention that allows her and her family to be alive.

Stomach cancer isn't one of the most common forms of cancer and doesn't get a lot of attention. Beth, Mike, and their families have worked closely with the medical community to raise awareness of that. According to their website, [metropolitanremoval.com](http://metropolitanremoval.com), symptoms of stomach cancer may be vague and include indigestion, abdominal pain or discomfort, nausea and vomiting, bloating or the feeling of fullness when eating a meal (also called early satiety). These symptoms can be associated with other illnesses, making early detection difficult. It's important to talk to a doctor who can perform tests to determine the cause of symptoms, as well as discussing your family history.

Directing people to resources and telling their story are what's important to Beth. It's one of the reasons she and her family have worked so hard when families get together and discussing family history, while it can be uncomfortable, is so important.

Throughout all her health crises, Beth has remained upbeat and appreciative, an attitude that can be transferred to any of life's crises or problems. "These are life lessons," she said. "We really were lucky because I probably wouldn't be alive right now if I hadn't had the surgery. My brother saved my life."

"We've always had that perspective," she finished. "We're lucky our particular mutation had a solution. We're lucky our particular mutation had a solution."

Metropolitan Removal Company is located on William Way and can be reached at 508-634-9293, or [services@metropolitanremoval.com](mailto:services@metropolitanremoval.com). Follow their Facebook page for more information on weekly giveaways.

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



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## Attachment B

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AUG 20 2020

Bellingham Planning Dept

7/20/2020

Town of Bellingham  
Office of the Planning Department  
10 Mechanic Street  
Bellingham MA 02050

In accordance with 935 CMR 500.000 et seq., notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled online for Monday, August 10th, 2020 at 7 PM. The online community meeting can be attended by going to the home page of the Town of Bellingham website where it says "virtual public meetings" or by typing the following URL into your preferred web browser.

**<https://www.bellinghamma.org/home/pages/links-public-meeting-video-conferencing>**

The proposed Delivery Only marijuana establishment is anticipated to be located at 24 William Way in Bellingham, MA. There will be an opportunity for the public to ask questions during the virtual meeting but the public may also ask questions in advance to be answered during the meeting. Anyone wishing to ask their questions in advance can email them to [info@frozen4llc.com](mailto:info@frozen4llc.com) and all questions received before 7 PM on Monday, August 10th will be read and answered during the meeting.

***For questions, please contact the Bellingham Town Clerk's Office;***  
10 Mechanic Street, Bellingham, MA 02019 / 508-657-2830 - Phone



7/20/2020

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2020 JUL 20 A 10:52

OFFICE OF THE  
TOWN CLERK

Town of Bellingham  
Office of the Town Clerk  
10 Mechanic Street  
Bellingham MA 02050

In accordance with 935 CMR 500.000 et seq., notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled online for Monday, August 10th, 2020 at 7 PM. The online community meeting can be attended by going to the home page of the Town of Bellingham website where it says "virtual public meetings" or by typing the following URL into your preferred web browser.

**<https://www.bellinghamma.org/home/pages/links-public-meeting-video-conferencing>**

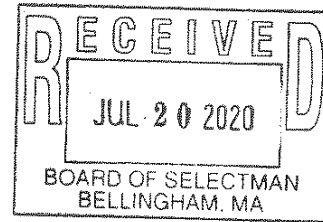
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***For questions, please contact the Bellingham Town Clerk's Office;***  
10 Mechanic Street, Bellingham, MA 02019 / 508-657-2830 - Phone



7/20/2020

Town of Bellingham  
Office of the Town Administrator  
10 Mechanic Street  
Bellingham MA 02050



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***For questions, please contact the Bellingham Town Clerk's Office;***  
10 Mechanic Street, Bellingham, MA 02019 / 508-657-2830 - Phone



7/28/20

24 William Way, LLC  
618 Columbia Road  
Dorchester, MA 02125

# Attachment C

In accordance with 935 CMR 500.000 et seq., notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled online for Monday, August 10th, 2020 at 7 PM. The online community meeting can be attended by going to the home page of the Town of Bellingham website and click where it says "virtual public meetings" which is circled in green in the example below or by typing the following URL into your preferred web browser.

<https://www.bellinghamma.org/home/pages/links-public-meeting-video-conferencing>



The proposed Delivery Only marijuana establishment is anticipated to be located at 24 William Way in Bellingham, MA. There will be an opportunity for the public to ask questions during the virtual meeting but the public may also ask questions in advance to be answered during the meeting. Anyone wishing to ask their questions in advance can email them to [info@frozen4llc.com](mailto:info@frozen4llc.com) and all questions received before 7 PM on Monday, August 10th will be read and answered during the meeting.

***For questions, please contact the Bellingham Town Clerk's Office;***  
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07/30/2020



**TOWN OF BELLINGHAM**  
**ASSESSMENT ADMINISTRATION OFFICE**  
**TOWN HALL**  
**BELLINGHAM, MASSACHUSETTS 02019**  
**PHONE (508) 637-3362 FAX (508) 637-3394**

Date of Application 7/20/2020

**REQUEST FOR LIST OF ABUTTERS**

Effective July 22, 2012 - a \$20.00 Fee PER LIST is required to process your request. Payment is due at the time of submission of this form. Please allow 10 days from the date of payment and submission of the form for the Assessors office to complete the processing of your request.

*\*Please note that these fees apply to preparation of new list or verification or reverification of an existing or expired list.*

Please indicate with a check

☐ Immediate Abutters (Board of Selectmen)

☒ Abutter to Abutter within 300 feet

☐ Conservation Commission within 100 feet

☐ Abutter to Abutter within 1/2 mile

☐ Abutter to Abutter within 1 mile

Map 0048 Parcel(s) B: 0015 C: 0000

Froner 4 Corp.  
Applicant (please print)

24 Williams Way  
Location of Property

[Signature]  
Signature of Applicant

619 Columbia Rd. Dorchest. 02125  
Mailing Address of Applicant

617. 990. 4653  
Telephone Number

**ABUTTERS LIST IS VALID FOR THIRTY (30) DAYS AFTER COMPLETION**





## TOWN OF BELLINGHAM

*Assessment Administration Office*  
Municipal Center - 10 Mechanic Street  
Bellingham, Massachusetts 02019  
508-657-2862 \* FAX 508-657-2894  
Email: [Assessors@bellinghamma.org](mailto:Assessors@bellinghamma.org)  
[www.bellinghamma.org](http://www.bellinghamma.org)

July 22, 2020

THE PROPERTY OWNERS LISTED HEREIN ARE THE KNOWN ABUTTERS TO THE  
PROPERTY OWNERS:

ABUTTER TO ABUTTER WITHIN 300 FEET OF MAP 48 PARCEL 15

Property Address:	24 William Way Bellingham, MA. 02019
Owner of Record:	William Way Partners LLC 24 William Way Bellingham, MA. 02019
Requested by:	Frozen 4 Corp 618 Columbia Rd. Dorchester, MA. 02125

ABUTTERS ATTACHED

Certified:   
Cheryl A. Hanly, Assessment Technician, MAA





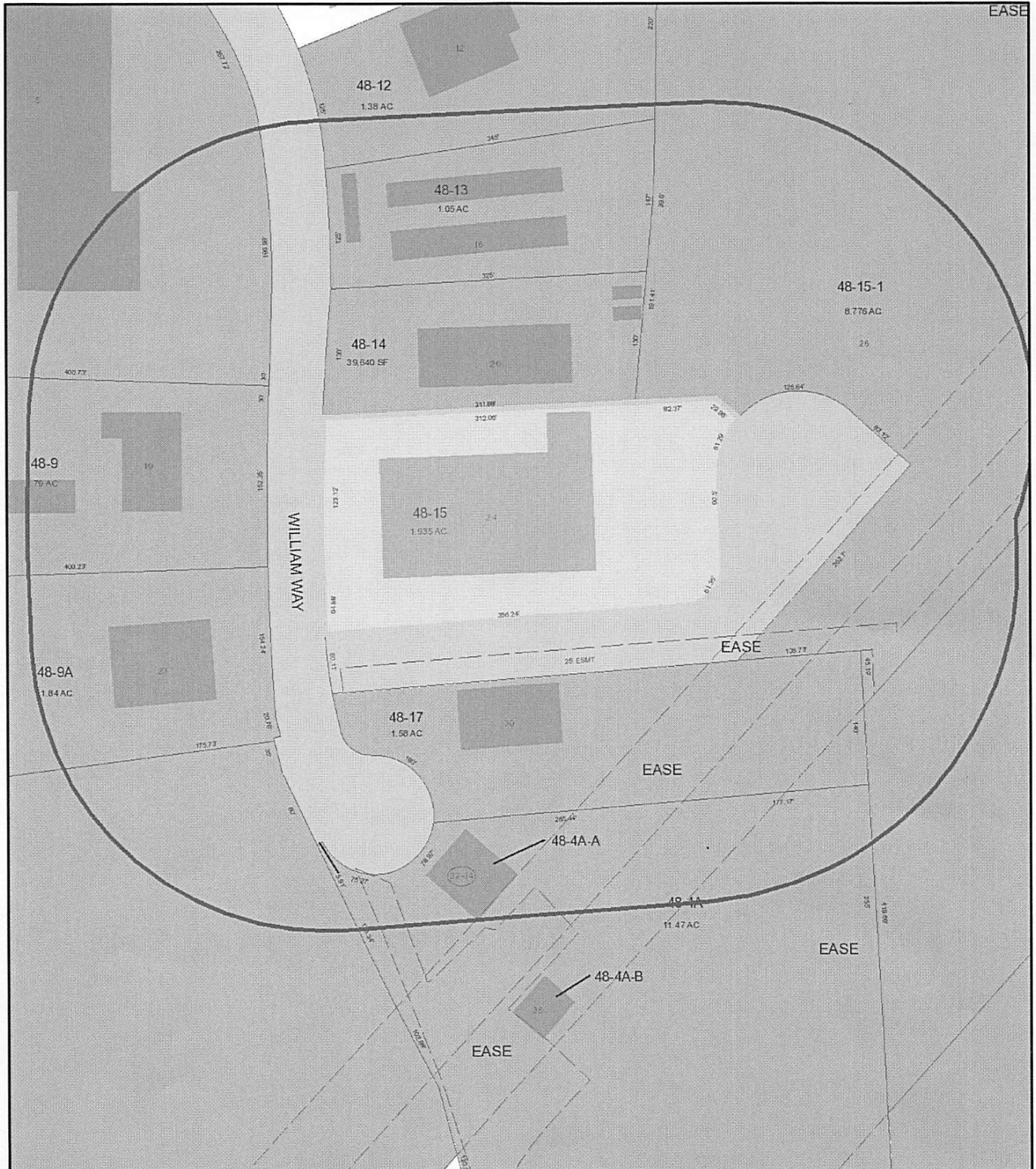
Bellingham, MA

1 inch = 139 Feet

**CAI** Technologies  
Precision Mapping. Geospatial Solutions.

0 139 278 417

July 22, 2020



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

 COPY



**FROM:** Frozen 4 Corporation

**TO:** Cannabis Control Commission

**DATE:** August 17th, 2020

**RE:** Revised Plan to remain compliant with Local Zoning for RFI #1

**PLAN:**

Frozen 4 Corporation ("F4C") will operate a Delivery Only Business at 24 Williams Way in Bellingham, MA. The Bellingham Zoning Code allows cannabis establishment use by Special Permit within an Industrial District. F4C will comply with all applicable town regulations and bylaws in doing so. F4C shall comply with the Town of Bellingham's zoning bylaws as they relate to a Recreational marijuana product manufacturer.

The property located at 24 Williams Way lies entirely within the allowed industrial zone as set forth in Bellingham's zoning bylaws which allows F4C's proposed use in this zone. The special permit for this Marijuana Establishment to operate a Delivery Only business has already been granted by the Town of Bellingham. The only remaining requirement for the issued special permit is for F4C to receive a Certificate of Occupancy from the Town of Bellingham prior to beginning operations at this site.

In addition, F4C has already met with the Town Admin, the Board of Selectmen, the Police Chief, Fire Chief, Town Planner and Building Inspector as well as other appropriate department heads to ensure continued compliance. Mr. Virga, Mr. Marut and professionals designated by them will interact with the town and will be responsible for assuring the F4C's ongoing compliance.





# THE COOK FAMILY CHARITABLE FUND, INC.

475 School Street, Suite 5 • Marshfield, MA 02050 • (781) 837-9222 • Fax (781) 837-9227  
DonateCookFamily.org

## EXECUTIVE COMMITTEE

JAMES CASSETTA M.P.A.

TROY CLARKSON

ELIZABETH B. COOK

KELLY COOK

PETER A. COOK, JR. †\*

PETER A. COOK, SR. †\*

S. CRAIG GILLARD, M.D.

JOHN F. HARRINGTON

ALISON T. JOYCE

CHRISTOPHER J. JOYCE

WILLIAM B. LACY, PH.D.

ROBERT MCDONALD

PAUL A. QUARANTO, JR.

EDWIN SARGENT

PENNY SARGENT

ELIZABETH A. THIELE, M.D., PH.D.

PETER I. THOMPSON

MATTHEW WILLIAMS

GAIL YACCUZZO

\*FOUNDER

† DIRECTOR

## SCHOLARSHIP ADVISORY BOARD

MAYOR BILL CARPENTER

STEPHEN KANE D.M.D.

MICHAEL A. MARESCO

CHIEF PHIL TAVARES

PETER I. THOMPSON

July 6th, 2020

Benjamin C. Virga  
Frozen 4 Corporation  
618 Columbia Road  
Dorchester MA 02125

To whom it may concern:

The Cook Family Charitable Fund is aware of the planned donations to be made by Frozen 4 Corporation as part of their Plan for Positive Impact being submitted to Cannabis Control Commission and we will gladly accept their donation. The Cook Family Charitable Fund has both planned and current programs in place already that are focused on serving the communities of Brockton and Taunton as well as other neighboring towns in Massachusetts.

Very Truly Yours,

Peter A. Cook, Sr.  
Trustee





July 9, 2020

To: Ben Virga, Frozen 4 Corporation

Subject: Donation Letter

To: Cannabis Control Commission

The virtual Cannabis Center of Excellence, INC is a 501c3 non-profit organization dedicated to advancing access and social justice in the cannabis industry through collaboration and citizen science.

Frozen 4 intends to work with the Cannabis Center of Excellence, INC on diversity hiring plans and donations to support social justice and training.

The virtual Cannabis Center of Excellence, INC is in contact with and willing to receive donations that Frozen 4 intends to provide.

Best,

A handwritten signature in black ink, appearing to read "Marion McNabb", with a stylized, flowing script.

Marion McNabb, DrPH, MPH

President

Cannabis Center of Excellence, INC

[www.cannacenterofexcellence.org](http://www.cannacenterofexcellence.org)

[Marion@cannacenterofexcellence.org](mailto:Marion@cannacenterofexcellence.org)



**FROM: Frozen 4 Corporation**

**TO: Cannabis Control Commission**

**DATE: August 17th, 2020**

**RE: Revised Plan for Positive Impact for RFI #2 dated 8/18/20**

**Summary**

Frozen 4, Corp. (“F4C”) is dedicated to positively impacting communities disproportionately affected by cannabis prohibition and enforcement, including impacted individuals and business enterprises (hereinafter described as “DPI communities”). In particular, F4C believes that marijuana establishments have an obligation, both legal and moral, to make significant contributions to support communities that have historically high rates of arrest, conviction, and incarceration related to marijuana crimes.

**Positive Impact Plan Goals**

F4C has adopted a Positive Impact Plan (“Plan”) described herein for the purpose of positively impacting DPI communities. F4C has selected the town of Bellingham for its proposed marijuana establishment. While the town of Bellingham does not fall within an area of disproportionate impact as defined under 935 CMR 500.101(1)(a)(11), or as described in CCC’s “Guidance for Identifying Areas of Disproportionate Impact” dated April 2018, F4C intends to positively impact the nearby DPI communities of Taunton, Walpole, Mansfield and Brockton, as well as Massachusetts residents who have had prior drug convictions. Under the Plan, F4C shall establish the following goals:

- **Hiring:** Prioritize the hiring of individuals that currently reside or have previously resided in DPI communities such as Taunton, Walpole, Mansfield and Brockton or MA residents with prior drug convictions.

**Hiring Objective:** F4C shall hire and retain a staff that consists of at least 75% of residents that currently reside or have previously resided in DPI communities such as Taunton, Walpole, Mansfield and Brockton and/or 50% of Massachusetts residents who have had past drug convictions.



- **Education and Training:** Provide cannabis education, industry-specific technical training and mentoring services for individuals facing systemic barriers.

**Education and Training Objective:** On an annual basis, F4C shall conduct no less than 4 industry-specific job training programs for individuals expressing interest in the commercial adult-use cannabis industry.

**Education and Training Objective:** F4C shall strive to hire and retain a staff that actively participates in ongoing education and training activities provided by F4C. Staff participation in these activities will be mandatory with each staff member required to attend at least one event every 12 months.

- **Skills and Capital:** Reduce financial, capitalization and knowledge-based barriers to entry for individuals and businesses in the commercial adult-use cannabis industry.

**Skills and Capital Objective:** On an annual basis F4C shall conduct not less than 4 seminars designed to promote financial literacy in the cannabis sector. These seminars will have the capacity for up to 100 attendees for each event and these seminars will occur in the DPI communities F4C shall be focused on. Our plan is to have at least one seminar per year in each of these 4 communities: Taunton, Walpole, Mansfield and Brockton. F4C Staff will be required to participate in these seminars when the subject of the event is related to their role within F4C.

- **Non-Profit Support:** Support non-profit organizations aligned with F4C's goals of community support and inclusiveness for individuals residing in DPI communities such as Taunton, Walpole, Mansfield and Brockton.

**Non-Profit Support Objective:** F4C shall ensure that not less than 60% of proceeds from the financial assistance fund is allocated to applicants from human services or economic development organizations.



### **Positive Impact Plan Programs**

**F4C shall adopt no less than four programs designed to meet the goals articulated above. The company shall internally evaluate the programs, not less frequently than annually, to measure the degree to which the programs achieve F4C's stated goals.**

- 1. Hiring from DPI Communities: F4C shall create additional opportunities for those individuals that currently reside or have previously resided in DPI communities such as Taunton, Walpole, Mansfield and Brockton.**
- 2. Hiring Past Offenders: F4C shall create additional opportunities for any MA resident with a prior drug conviction. F4C shall post quarterly newspaper advertisements in publications that focus on the communities of Taunton, Walpole, Mansfield and Brockton, such as the Taunton Gazette, the Brockton Enterprise and the Patriot Ledger, stating that the establishment is specifically seeking Massachusetts residents with past drug convictions for employment.**
  - a. At least 4 times per year (i.e. quarterly), F4C shall conduct community service days and participate in charity events within Taunton, Walpole, Mansfield and Brockton. It is our goal to build relationships within regional chambers of commerce and workforce development agencies as well as, align with educational resources such as drug recovery programs so that we may better identify and hire employees that meet program characteristics. These events will be attended by various F4C Staff who will be required to participate as well as being made available for any staff who wish to attend to be able to without using any of their designated PTO for the event.**
  - b. The following charity events are some examples of events F4C will be supporting in the DPI communities of Taunton, Walpole, Mansfield and Brockton on an annual basis;**
    - i. In Brockton, F4C will participate in and sponsor the O+E Annual Charity Golf Tournament for *The Brockton Area Arc*. This is the non-profit local chapter of The Arc, a national advocacy organization whose mission is to “work in**



partnership with, and for, the community to provide advocacy, information, and direct services for children and adults with intellectual and developmental disabilities (I/DD) and their families”.

- ii. In Taunton, F4C plans to participate in and sponsor the annual golf tournament held by the *Boys and Girls Club of MetroSouth* in Taunton. This is their largest fundraising event on their calendar.
- iii. In Mansfield, the local food pantry, *Our Daily Bread*, has an annual fundraiser that F4C will be supporting. This is the only fundraiser the food pantry does and F4C plans to be an annual contributor once operational.
- iv. In Walpole, F4C plans to form a Corporate Partnership with *The Home for Little Wanderers* and will support financially all of their annual fundraising events once F4C becomes operational.

3. **Education and Training:** At least quarterly, F4C shall conduct industry-specific job training programs in and around Taunton, Walpole, Mansfield and Brockton for individuals expressing interest in the commercial adult-use cannabis industry. The programs shall feature managers and staff with operational expertise, experts in plant science and agriculture, and presenters with finance, technology and accounting backgrounds within the marijuana sector. The program shall be designed to provide cultivation, manufacturing, packaging and/or retail expertise to program participants. The program shall also seek to raise awareness of educational and employment opportunities within the cannabis sector in Massachusetts. F4C shall conduct such seminars at least quarterly for the first two years of operation and shall assess thereafter the nature and frequency of such programs.

4. **Skills and Capital:** At least quarterly, F4C shall offer seminars to individuals within the communities of Taunton, Walpole, Mansfield and Brockton designed to promote financial literacy in the cannabis sector. Among other things, the programs shall be designed to: (i) inform participants in understanding and accessing sources of capital; (ii) educate participants in accounting, finance and technology relating to the cannabis sector; and (iii) offer mentorship opportunities and on-site



technical training.

5. **Non-Profit Support:** F4C shall provide financial assistance to non-profit and community-based organizations in Taunton, Walpole, Mansfield and Brockton as well as other DPI communities. F4C shall establish a fund derived from the operation of the business and adopt an application process through which non-profit and community-based organizations can seek funding. F4C shall prioritize applications from human services or economic development organizations such as The Cooke Family Charity Fund and Cannabis Center of Excellence
6. See letters from The Cooke Family Charity Fund and Cannabis Center of Excellence included with our application

**Plan Measurement and Accountability:** At least annually, F4C shall create a written report that shall evaluate the Plan and its success in advancing the goals of the Plan. In accordance with 935 CMR 500.103(4) (a), the report shall detail the following:

- employment impacts;
- number and subject matter of education and training events and seminars conducted;
- number of individuals and businesses that participated in such events;
- number and nature of mentorship relationships;
- aggregate data demonstrating the financial impacts of the Plan, including payroll, health care, tax, non-profit contribution, equity and debt performance; and demographic data reflecting specific positive impacts of the Plan on Taunton, Walpole, Mansfield and Brockton.

F4C shall post the report on its website and shall share the report with CCC and the community in a manner consistent with CCC regulation and Massachusetts law. Additionally, F4C shall establish a timeline, organized by month and objective, to track F4C's progress toward the goals and objectives of the Positive Impact Plan. F4C shall document the performance, in a writing suitable for submission to the CCC, not less than 90 days before its annual renewal date. That writing shall include a thorough analysis of the plan's progress and a



**written plan for continuous improvement.**

**Affirmative Statement**

**In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), F4C affirmatively states as follows:**

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



**THE COMMONWEALTH OF MASSACHUSETTS****William Francis Galvin**

Secretary of the Commonwealth

One Ashburton Place, Boston, Massachusetts 02108-1512

**Restated Articles of Organization****(General Laws Chapter 156D, Section 10.07; 950 CMR 113.35)**

- (1) Exact name of the corporation: Frozen 4 Corporation
- (2) Registered office address: 130 Myricks Street, Berkley, Massachusetts 02779
- (3) Date adopted: June 24, 2020
- (4) Approved by:

(check appropriate box)

☒ the directors without shareholder approval and shareholder approval was not required;

OR

☐ the board of directors and the shareholders in the manner required by G.L. Chapter 156D and the corporation's articles of organization.

- (5) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02 except that the supplemental information provided for in Article VIII is not required:

**ARTICLE I**

The exact name of the corporation is: Frozen 4 Corporation

**ARTICLE II**

This corporation shall have the purpose of engaging in any lawful business.

**ARTICLE III**

The total number of shares of each class of stock that the corporation is authorized to issue is 1,000,000 shares of Common Stock, \$0.00 par value per share ("Common Stock"), 510,000 shares of which are hereby designated as Class A Common Stock ("Class A Common Stock"), and 490,000 shares of which are hereby designated Class B Common Stock ("Class B Common Stock").



## ARTICLE IV

The following is a statement of the designations and the powers, privileges and rights, and the qualifications, limitations or restrictions thereof in respect of each class of capital stock of the Corporation.

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

2. Dividends. Payment of any dividends to the holders of Class A Common Stock and Class B Common Stock shall be on a pro rata, pari passu basis.

3. Liquidation, Dissolution or Winding Up; Certain Mergers, Consolidations and Asset Sales. In the event of any voluntary or involuntary liquidation, dissolution or winding up of the Corporation, the assets of the Corporation available for distribution to its stockholders or, in the case of a Deemed Liquidation Event (as defined below), the consideration received by the Corporation in relation thereto, as the case may be, shall be distributed among the holders of Common Stock, pro rata based on the number of shares held by each such holder.

a. Deemed Liquidation Events.

i. Definition. Each of the following events shall be considered a “Deemed Liquidation Event”:

1. a merger or consolidation in which (A) the Corporation is a constituent party or (B) a subsidiary of the Corporation is a constituent party and the Corporation issues shares of its capital stock pursuant to such merger or consolidation, except any such merger or consolidation involving the Corporation or a subsidiary in which the shares of capital stock of the Corporation outstanding immediately prior to such merger or consolidation continue to represent, or are converted into or exchanged for shares of capital stock that represent, immediately following such merger or consolidation, at least a majority, by voting power, of the capital stock of (1) the surviving or resulting corporation; or (2) if the surviving or resulting corporation is a wholly owned subsidiary of another corporation immediately following such merger or consolidation, the parent corporation of such surviving or resulting corporation; or

2. (A) the sale, transfer, or other final disposition, in a single transaction or series of related transactions, by the Corporation or any subsidiary of the Corporation of all or substantially all the assets of the Corporation and its subsidiaries taken as a whole (specifically including all or substantially all of the Corporation’s and its subsidiaries transferable governmental permits, licenses and authorizations to engage in the cultivations, transportation and sale of cannabis), or (B) the sale, transfer or other final disposition, whether in a single transaction or a series of related transactions, of one or more subsidiaries of the Corporation if substantially all of the assets of the Corporation and its subsidiaries taken as a whole are held by such subsidiary or subsidiaries, except where such sale, transfer, or other disposition is to a wholly owned subsidiary of the Corporation.



ii. Effecting a Deemed Liquidation Event. In the event of a Deemed Liquidation Event referred to in Subsection 3(a)(i)(2), if the Corporation does not effect a dissolution of the Corporation under the MBCA within sixty (60) days after such Deemed Liquidation Event, then (i) the Corporation shall send a written notice to each holder of Class B Common Stock no later than the sixtieth (60th) day after the Deemed Liquidation Event (or at such sooner date as the Board of Directors of the Corporation (the “Board”) determines that there will be no such dissolution) advising such holders of their right (and the requirements to be met to secure such right) pursuant to the terms of the following clause; (ii) to require the redemption of all outstanding shares of Common Stock, and (iii) if the holders of a majority of the then outstanding shares of Class B Common Stock so request in a written instrument delivered to the Corporation not later than thirty (30) days after receipt of such notice, the Corporation shall use the consideration received by the Corporation for such Deemed Liquidation Event (net of any retained liabilities associated with the assets sold or technology licensed, as determined in good faith by the Board), together with any other assets of the Corporation available for distribution to its stockholders, all to the extent permitted by Massachusetts law governing distributions to stockholders (the “Available Proceeds”), no later than the on the one hundred twentieth (120th) day after such Deemed Liquidation Event, to redeem all outstanding shares of Common Stock at a price per share equal to the Available Proceeds *divided by* the total number of shares of Common Stock then outstanding. Prior to the distribution or redemption provided for in this Subsection, the Corporation shall not expend or dissipate the consideration received for such Deemed Liquidation Event, except to discharge expenses incurred in connection with such Deemed Liquidation Event and ongoing or unpaid taxes, and obligations incurred prior to such Deemed Liquidation Event or in the ordinary course of business in light of the Corporation’s reasonable post-Deemed Liquidation Event requirements.

iii. Amount Deemed Paid or Distributed. In any Deemed Liquidation Event, if Available Proceeds are in a form of property other than in cash, the value of such distribution shall be deemed to be the fair market value of such property. The determination of fair market value of such property shall be made in good faith by the Board, including the approval of the Class B Director.

#### 4. Voting.

a. General. On any matter presented to the stockholders of the Corporation for their action or consideration at any meeting of stockholders of the Corporation (or by written consent of stockholders in lieu of meeting), each holder of outstanding shares of Class A Common Stock and Class B Common Stock shall be entitled to cast one vote for each share of Common Stock held by such holder as of the record date for determining stockholders entitled to vote on such matter (subject to appropriate adjustment in the event of any stock dividend, stock split, combination or other similar recapitalization with respect to the Class A Common Stock or Class B Common Stock). Except as provided by law or by the other provisions of these Restated Articles of Organization, holders of Class A Common Stock and Class B Common Stock shall vote together as a single class.

b. Election of Directors. For so long as there remain outstanding no fewer than 510,000 shares of Class A Common Stock (subject to appropriate adjustment in the event of any stock dividend, stock split, combination or other similar recapitalization with respect to the



Class A Common Stock), the holders of record of the shares of Class A Common Stock, exclusively and as a separate class, shall be entitled to elect two directors of the Corporation (each, a “Class A Common Stock Director”); and, for so long as any shares of Class B Common Stock remain outstanding, the holders of record of the shares of Class B Common Stock, exclusively and as a separate class, shall be entitled to elect one director of the Corporation (the “Class B Common Stock Director”). Any director elected as provided in the preceding sentence may be removed by, and only by, the affirmative vote of the holders of the shares of the class of capital stock entitled to elect such director or directors, given either at a special meeting of such stockholders duly called for that purpose or pursuant to a written consent of stockholders. If the holders of shares of Class A Common Stock or Class B Common Stock, as the case may be, fail to elect a sufficient number of directors to fill all directorships for which they are entitled to elect directors, voting exclusively and as a separate class, pursuant to the first sentence of this Subsection, then any directorship not so filled shall remain vacant until such time as the holders of the Class A Common Stock or Class B Common Stock, as the case may be, elect a person to fill such directorship by vote or written consent in lieu of a meeting; and no such directorship may be filled by stockholders of the Corporation other than by the stockholders of the Corporation that are entitled to elect a person to fill such directorship, voting exclusively and as a separate class. The holders of record of the shares of Common Stock and of any other class or series of voting stock, exclusively and voting together as a single class, shall be entitled to elect the balance of the total number of directors of the Corporation. At any meeting held for the purpose of electing a director, the presence in person or by proxy of the holders of a majority of the outstanding shares of the class or series entitled to elect such director shall constitute a quorum for the purpose of electing such director. Except as otherwise provided in this Subsection, a vacancy in any directorship filled by the holders of any class or series of capital stock shall be filled only by vote or written consent in lieu of a meeting of the holders of such class or series or by any remaining director or directors elected by the holders of such class or series pursuant to this Subsection.

c. Class B Common Stock Protective Provisions. At any time when any shares of Class B Common Stock remain outstanding, the Corporation shall not, either directly or indirectly by amendment, merger, consolidation or otherwise, do any of the following without (in addition to any other vote required by law or these Restated Articles of Organization) the written consent or affirmative vote of the holders of a majority of the then-outstanding shares of Class B Common Stock, given in writing or by vote at a meeting, consenting or voting (as the case may be) separately as a class, and any such act or transaction entered into without such consent or vote shall be null and void *ab initio*, and of no force or effect:

i. amend, alter or repeal any provision of these Restated Articles of Organization or Bylaws of the Corporation;

ii. engage or agree to engage in any transaction or series of transactions which would constitute a Deemed Liquidation Event;

iii. (a) create or authorize the creation of or issue any equity security of the Corporation, (b) create or authorize the creation of or issue any other security convertible into or exercisable for any equity security of the Corporation, or (iii) increase the authorized number of shares of the Corporation’s Common Stock;



iv. purchase or redeem (or permit any subsidiary to purchase or redeem) or pay or declare any dividend or make any distribution on, any shares of capital stock of the Corporation;

v. terminate, amend or waive any rights of the Corporation under any existing contract or agreement, or enter into any new contract or agreement, which contract or agreement involves the payment, contribution, or assignment by the Corporation or to the Corporation, during any one-year period of the term of such contract or agreement, of money or assets greater than \$50,000;

vi. create, or authorize the creation of, or issue, or authorize the issuance of any debt security, or permit any subsidiary to take any such action with respect to any debt security, or incur any other indebtedness or allow any subsidiary to incur any other indebtedness, unless such debt security or other indebtedness has been approved by the Board, including the Class B Common Stock Director;

vii. significantly modify the Corporation's business plan, enter into any new line of business, or exit any existing line of business; or

viii. increase or decrease the number of directors which constitutes the whole board of directors of the Corporation.

5. Waiver. Any of the rights, powers, preferences and other terms of any class of capital stock set forth herein may be waived on behalf of all holders of such class by the affirmative written consent or vote of the holders of a majority of the shares of such class then outstanding.

6. Notices. Any notice required or permitted by the provisions of this Article IV to be given to a holder of shares capital stock of the Corporation shall be mailed, postage prepaid, to the post office address last shown on the records of the Corporation, or given by electronic communication in compliance with the provisions of applicable law, and shall be deemed sent upon such mailing or electronic transmission.

## ARTICLE V

No restrictions are imposed by the articles of organization upon the transfer of shares of any class or series of stock, *provided that* the Corporation and one or more holders of shares of stock may enter into separate contractual arrangements imposing such restrictions on transfer, subject to approval by the Board, including the Class B Common Stock Director.

## ARTICLE VI

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

1. Number of Directors Comprising the Whole Board; Election. Subject to any additional vote required by these Restated Articles of Organization, the number of directors of the Corporation shall be determined in the manner set forth in the Bylaws of the Corporation.



Elections of directors need not be by written ballot unless the Bylaws of the Corporation shall so provide.

2. Bylaws. Subject to any additional vote required by these Restated Articles of Organization, the Board (including approval of the Class B Common Stock Director) may make, amend, or repeal the bylaws of the Corporation (as such may be amended, the “Bylaws”) in whole or in part, except with respect to any provision thereof that, by virtue of an express provision in Chapter 156D of the Massachusetts General Laws, as the same exists or may hereafter be amended, or any successor thereto (“Chapter 156D”), the articles of organization of the Corporation, as the same exists or may hereafter be amended, or the Bylaws, requires action by the shareholders of the Corporation.

3. Limitation of Director Liability. Except to the extent that Chapter 156D prohibits the elimination or limitation of liability of directors, no director of the corporation shall be personally liable to the corporation or its Stockholders for monetary damages for any breach of fiduciary duty as a director, notwithstanding any provision of law imposing such liability. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any director of the corporation for or with respect to any acts or omissions of such director occurring prior to such amendment.

4. Director Indemnification. The Corporation shall, to the maximum extent permitted from time to time under the law of the Commonwealth of Massachusetts, indemnify and upon request shall advance expenses to any person who is or was a party or is threatened to be made a party to any threatened, pending or completed action, suit, proceeding or claim, whether civil, criminal, administrative or investigative, by reason of the fact that such person is or was a director or officer of the Corporation or while a director or officer is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee or agent of any corporation, partnership, joint venture, trust or other enterprise, including service with respect to employee benefit plans, against expenses (including attorney’s fees and expenses), judgments, fines, penalties and amounts paid in settlement incurred in connection with the investigation, preparation to defend or defense of such action, suit, proceeding or claim; provided, however, that the foregoing shall not require the Corporation to indemnify or advance expenses to any person in connection with any action, suit, proceeding or claim initiated by or on behalf of such person or any counterclaim against the Corporation initiated by or on behalf of such person. Such indemnification shall not be exclusive of other indemnification rights arising under any by-law, agreement, vote of directors or stockholders or otherwise and shall inure to the benefit of the heirs and legal representatives of such person. Any person seeking indemnification under this part (D) of this Article VI shall be deemed to have met the standard of conduct required for such indemnification unless the contrary shall be established. The Corporation shall be the indemnitor of first resort for any director or officer who is entitled to indemnification and advancement pursuant to this part (D) of this Article VI (i.e., the Corporation’s obligations to indemnify a director or officer shall be primary and any obligation of a current or former third party employer, partnership of which such director or officer is a partner, limited liability company of which such director or officer is a member or affiliate of such director or officer (any such person, an “Indemnitor”), to advance expenses or provide indemnification for the same expenses or liabilities incurred by such director or officer are secondary) and it shall be required to advance the full amount of expenses incurred by such director or officer and shall be liable for



the full amount of expenses, judgments, penalties, fines and amounts paid in settlement to the extent legally permitted and as required by these Restated Articles of Organization (or any other agreement between the Corporation and such director or officer), without regard to any rights such director or officer may have against any Indemnitor. The Corporation shall have no right to seek contribution or other reimbursement from any Indemnitor for any payments by the Corporation.

Any amendment, repeal or modification of the foregoing provisions of this part (D) of this Article VI shall not adversely affect any right or protection of any director, officer or other agent of the Corporation with respect to any acts or omissions of such director occurring prior to such repeal or modification.

5. Excluded Opportunities. Except as set forth in any separate written agreement to which the Corporation is party, the Corporation renounces, to the fullest extent permitted by law, any interest or expectancy of the Corporation in, or in being offered an opportunity to participate in, any Excluded Opportunity. An “Excluded Opportunity” is any matter, transaction or interest that is presented to, or acquired, created or developed by, or which otherwise comes into the possession of (i) any director of the Corporation who is not an employee of the Corporation or any of its subsidiaries, or (ii) any holder of Class B Common Stock, or any partner, member, director, stockholder, employee or agent of any such holder, other than someone who is an employee of the Corporation or any of its subsidiaries (collectively, “Covered Persons”), unless such matter, transaction or interest is presented to, or acquired, created or developed by, or otherwise comes into the possession of, a Covered Person expressly and solely in such Covered Person’s capacity as a director of the Corporation.

6. Interested Party Transactions. The Corporation may enter into contracts or transact business with one or more of the Directors or its officers or stockholders, or with any corporation, organization or other concern in which one or more of the Directors, or its officers or stockholders, are directors, officers or stockholders or are otherwise interested and may enter into other contracts or transactions in which one or more of the Directors, or its officers or stockholders, are in any way interested. In the absence of fraud, no such contract or transaction shall be invalidated or in any way affected by the fact that such one or more of the Directors, or the officers or stockholders of the Corporation, have or may have any interest that is or might be adverse to the interest of the Corporation even though the vote or action of the Directors, or the officers or stockholders of the Corporation, having such adverse interest may have been necessary to obligate the Corporation upon such contract or transaction.

At any meeting of the Board (or of any duly authorized committee thereof) at which any such contract or transaction shall be authorized or ratified, any Director having such adverse interest may vote or act thereat with like force and effect as if such Director had no such interest, provided in such case that the nature of such interest (though not necessarily the extent or details thereof) shall be disclosed or shall have been known to the Directors. A general notice that a Director or officer is interested in any corporation, organization or other concern of any kind referred to above shall be a sufficient disclosure as to the interest of such Director or officer with respect to all contracts and transactions with such corporation, organization or other concern. No Director shall be disqualified from holding office as a Director or as an officer of the Corporation by reason of any such adverse interest, unless the Board shall determine that such adverse



interest is detrimental to the Corporation. In the absence of fraud, no Director, and no officer or stockholder of the Corporation, having such adverse interest shall be liable on account of such adverse interest to the Corporation or to any stockholder or creditor thereof or to any other person for any loss incurred by it under or by reason of such contract or transaction, nor shall any such Director, officer or stockholder be accountable on such ground for any gains or profits realized thereon.

7. Stockholder Action Without a Meeting by Less than Unanimous Consent.

Action required or permitted by Chapter 156D or its successor to be taken at a Stockholders' meeting may be taken without a meeting by Stockholders having not less than the minimum number of votes necessary to take the action at a meeting at which all Stockholders entitled to vote on the action are present and voting. If any provision of Chapter 156D would otherwise require the affirmative vote of more than a majority of the shares in any voting group of shareholders of the Corporation for favorable action to be taken on a matter, favorable action may nevertheless be taken by vote of a majority of all the shares in such voting group entitled to vote on the matter. Promptly following the adoption of such an action in accordance with this provision, the Corporation shall give notice of such vote to all Stockholders.

**ARTICLE VII**

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

It is hereby certified that these restated articles of organization consolidate all amendments into a single document. If a new amendment authorizes an exchange, or effects a reclassification or cancellation, of issued shares, provisions for implementing that action are set forth in these restated articles unless contained in the text of the amendment.

Specify the number(s) of the article(s) being amended: Articles III, IV, V and VI.

Signed by: /s/ Benjamin Virga

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

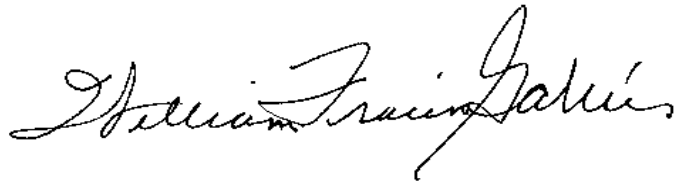
on this 24th day of June, 2020.



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:

June 25, 2020 05:14 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*



**Bylaws  
of  
Frozen 4 Corporation**

*Adopted on October 29, 2018*



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BYLAWS  
OF  
FROZEN 4 CORPORATION

I.

ARTICLES OF ORGANIZATION

The name of the corporation shall be as set forth in the articles of organization. The corporation shall have the purpose of engaging in any lawful business, unless a more limited purpose is set forth in the articles of organization. The powers of the corporation shall be all powers as set forth in the Massachusetts Business Corporation Act (the “Act”), unless more limited powers or restrictions on any powers are set forth in the articles of organization. The powers of the corporation’s directors and shareholders, or any class of shareholders if the corporation has more than one class of shares, and all matters concerning the conduct and regulation of the business and affairs of the corporation shall be subject to such provisions in regard thereto, if any, as are set forth in the articles of organization. In the event of any inconsistency between the articles of organization and these bylaws, the articles of organization shall be controlling. All references in these bylaws to the articles of organization shall be construed to mean the articles of organization of the corporation as from time to time in effect.

II.

SHAREHOLDERS

a. Annual Meeting.

Unless the date and time are determined by the board of directors as set forth below, the annual meeting of shareholders shall be held at 10:00 a.m. (Boston time) on the 2<sup>nd</sup> Wednesday of May in each year unless such date is a legal holiday or the board of directors has determined a different date and time for the annual meeting. If such date is a legal holiday, then the annual meeting shall be held at the same hour on the next succeeding business day not a legal holiday. If the board of directors determines the date and time for the annual meeting, the annual meeting shall be held on such date, at such time. The purposes for which an annual meeting is to be held include the election of directors and transacting such other business as may properly be brought before such meeting.

b. Special Meetings.

A special meeting of shareholders, including a special meeting held in lieu of the annual meeting, may be called at any time by the president or by the directors. Upon written application of one or more shareholders who hold in the aggregate at least ten percent (10%) of all votes, which written application or applications shall be signed and dated by such shareholders and



shall state the purpose for which the meeting is to be held, a special meeting shall be called by the secretary, or in case of the death, absence, incapacity or refusal of the secretary, by any other officer. Each call of a meeting shall state the place, date, hour and purposes of the meeting.

c. Place of Meetings.

The place at which any special or annual meeting of shareholders shall be held shall be fixed by the board of directors. Meetings of shareholders may be held at any physical location in or outside Massachusetts. Any adjourned session of any meeting of the shareholders shall be held at the place designated in the vote of adjournment, or if no such place is designated, at the same place or by the same remote communication method as the adjourned meeting.

In addition, the board of directors may authorize any meeting to be held solely by remote communication with no fixed physical location, or may authorize that any shareholder or proxy not physically present at a meeting may participate in the meeting and be deemed present and entitled to vote. In the event that any shareholder or proxy is permitted to participate in a meeting by means of remote electronic communication: (a) the corporation shall implement reasonable measures to verify that each person present and permitted to vote at a meeting is a shareholder or proxy; (b) the corporation shall implement reasonable measures to provide such shareholders and proxies a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings; and (c) if a shareholder or proxy votes or takes other action by remote communication at the meeting, a record of the vote or other action shall be maintained by the corporation.

d. Record Date for Purpose of Meetings.

The directors may fix in advance a time not more than seventy (70) days before the date of any meeting of shareholders as the record date for determining the shareholders having the right to notice of and to vote at such meeting and any adjournment thereof. In such case only shareholders of record on such date shall have such right, notwithstanding any transfer of shares on the books of the corporation after the record date. If no record date is fixed, the record date for determining shareholders having the right to notice of or to vote at a meeting of shareholders shall be at the close of business on the day before the day on which notice is given. If any meeting is adjourned to a date more than one hundred twenty (120) days after the date fixed for the original meeting, the directors shall fix a new record date.

e. Notice of Meetings.

Written notice of the place, day and hour of all meetings of shareholders shall be given by the secretary, the assistant secretary or an officer designated by the directors, at least seven (7) days but no more than sixty (60) days before the meeting, to each shareholder entitled to vote thereat and to each shareholder who, by the Act, under the articles of organization or under the



bylaws, is entitled to such notice. Notice of an adjourned meeting shall be given only if a new record date is fixed, in which case notice shall be given to all shareholders as of the new record date. The notice of a meeting shall state the purposes of the meeting. At a special meeting of shareholders, only business within the purpose or purposes described in the meeting notice may be conducted. Notice may be given by leaving such notice with the shareholder or at his residence or usual place of business, by mailing it, postage prepaid, and addressed to such shareholder at his address as it appears in the books of the corporation, by facsimile telecommunication directed to a number furnished by the shareholder for the purpose, by electronic mail to the electronic mail address of the shareholder as it appears in the books of the corporation, or by any other electronic transmission (defined as any process of communication that does not directly involve the physical transfer of paper and that is suitable for the retention, retrieval and reproduction of information by the recipient). The corporation shall be entitled to rely on the address of a shareholder last notified to the corporation. In case of the death, absence, incapacity or refusal of the secretary, the assistant secretary or the officer designated by the directors, such notice may be given by any other officer or by a person designated either by the secretary or by the person or persons calling the meeting or by the board of directors. Whenever notice of a meeting is required to be given to a shareholder under any provision of the Act or of the articles of organization or these bylaws, no such notice need be given to a shareholder, if (a) a written waiver of notice, executed before or after the meeting by such shareholder or his attorney, thereunto authorized, is filed with the records of the meeting, or (b) such shareholder attends such meeting without protesting, prior to or at the meeting's commencement, the holding of the meeting or transacting business at the meeting.

f. Shareholders List for Meeting.

After fixing a record date for a meeting of shareholders, the secretary shall prepare an alphabetical list of all shareholders who are entitled to notice of the meeting. The shareholders list shall be available for inspection by any shareholder, his agent or attorney during the period beginning two days after notice of the meeting is given and continuing through the meeting at the corporation's principal office, at a place identified in the meeting notice or, if the meeting is to be held only by remote communication, on a reasonably accessible electronic network, provided that the information required to gain access to such list is provided with the notice of the meeting. A shareholder or his agent or attorney may copy the list at the principal office at his own expense as permitted by the Act.

g. Quorum.

At any meeting of the shareholders, a majority in interest of all the shares issued, outstanding and entitled to vote upon a question to be considered at such meeting shall constitute a quorum for the consideration of such question, except that, if two or more voting groups are entitled to vote upon such question as separate voting groups, then, in the case of each such voting group, a quorum shall consist of a majority of the votes entitled to be cast by the voting group for action on that matter. Notwithstanding the foregoing, shareholders, by a majority of the



votes properly cast upon the question whether or not a quorum is present, may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment thereof, unless (a) the shareholder attends solely to object to lack of notice, defective notice, or the conduct of the meeting on other grounds, and does not vote the shares or otherwise consent that they are to be deemed present; or (b) in the case of an adjournment, a new record date is or shall be set for that adjourned meeting.

h. Voting and Proxies.

Unless otherwise provided by the articles of organization, each shareholder shall have one vote for each share held by him of record on the record date and entitled to vote on the question or questions to be considered at any meeting of the shareholders according to the records of the corporation. Shareholders may vote either in person or by proxy appointed by written appointment form signed by the shareholder or his attorney in fact. An appointment form shall be valid for the period stated therein, or, if no period is stated, for a period of eleven (11) months from the date the shareholder signed the form, or the date of its receipt by the secretary or his agent, if undated. Appointment forms shall be filed with the secretary or other officer or agent authorized to tabulate votes before being voted. Except as otherwise limited therein, appointment forms appointing proxies for a particular meeting shall entitle the persons named therein to vote at any adjournment of such meeting but shall not be valid after final adjournment of such meeting. An appointment form with respect to shares held in the name of two or more persons shall be valid if executed by one of them unless at or prior to exercise of the appointment the corporation receives a specific written notice to the contrary from any one of them. An appointment form purporting to be executed by or on behalf of a shareholder shall be deemed valid unless challenged at or prior to its exercise.

i. Action at Meeting.

When a quorum of a voting group is present for the consideration of a matter at any meeting of the shareholders, favorable action on a matter, otherwise than the election of directors, is taken by the voting group if a majority in interest of the shares present in person or by proxy and entitled to vote on such question votes in favor of the action, except where a larger vote is required by the Act, the articles of organization or these bylaws. Any election of directors by a voting group shall be determined by a plurality of the votes cast by shareholders in the voting group present in person or by proxy at the meeting and entitled to vote in the election. No ballot shall be required for such election unless requested by a shareholder present in person or by proxy at the meeting and entitled to vote in the election. Shares of the corporation are not entitled to vote if they are owned, directly or indirectly, by another entity of which the corporation owns, directly or indirectly, a majority of the voting interests. The corporation may, however, vote any shares, including its own shares, held by it, directly or indirectly, in a fiduciary capacity.



j. Action without Meeting.

Any action required or permitted to be taken at any meeting of the shareholders may be taken without a meeting by all shareholders entitled to vote on the action, or if the articles of organization so provide, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting, as evidenced by written consents of such shareholders that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the corporation for inclusion with the records of meetings within sixty (60) days of the date of the earliest dated consent delivered to the corporation. The corporation must, at least seven (7) days before it takes any action in reliance on consent obtained in accordance with this provision, give written notice of its intended action to shareholders not entitled to vote on the action in any case where the Act would require such notice if the action were to be taken by voting shareholders at a meeting, and, if the action will be taken with less than unanimous consent, to all shareholders entitled to vote who did not consent to the action. Such notice shall be accompanied by the same material that the Act or these bylaws would require to be sent to such shareholders with a notice of meeting. The corporation may, for convenience, specify an effective date for such consents, provided that the corporation shall not take action in reliance upon such consents except in compliance with the articles of organization and these bylaws.

k. Electronic Action.

Any vote, consent, waiver, proxy appointment or other action by a shareholder shall be considered given in writing, dated and signed if it consists of an electronic transmission that allows the corporation to determine: (a) the date the transmission was sent; and (b) that the sender of the transmission was the relevant shareholder, proxy, or agent, or a person authorized to act on any such person's behalf. The date on which the electronic transmission was sent shall be considered the date on which it was signed.

III.

DIRECTORS

a. Powers.

All corporate power shall be exercised by or under the authority of, and the business and affairs of the corporation shall be managed under the direction of, a board of directors, subject to any limitation set forth in the articles of organization or in a shareholders' agreement. In particular, and without limiting the generality of the foregoing, the directors may from time to time issue all or any part of the unissued shares of the corporation authorized under the articles of organization, determine the number of authorized shares in any class or series, the distinguishing designation thereof, and the preferences, limitations and relative rights applicable



thereto, provided that the board of directors may not approve an aggregate number of authorized shares of all classes and series which exceeds the total number of authorized shares specified in the articles of organization approved by the shareholders. The directors may determine the consideration for which shares are to be issued and the manner of allocating such consideration between capital and surplus, and, before the corporation issues shares, shall determine that the consideration received or to be received is adequate. In the event of a vacancy in the board of directors, the remaining directors may exercise the powers of the full board until the vacancy is filled.

b. Election and Enlargement of Board.

The board of directors shall consist of at least one director. The first board shall consist of three directors. Thereafter, the board of directors shall consist of a number of directors not less than one and not more than five, and within such range, the number of directors shall be fixed from time to time by vote of a majority of the directors then in office or by the shareholders. The number of directors may be decreased or increased beyond such range only by vote of the shareholders. No director need be a shareholder.

c. Vacancies.

Any vacancy in the board of directors, including a vacancy resulting from the enlargement of the board, may be filled by the shareholders, by the board of directors, or if the directors remaining in office constitute fewer than a quorum, they may fill the vacancy by the vote of a majority of all the directors remaining in office. If the vacant office was held by a director elected by a voting group of shareholders, only the shareholders of that voting group or directors elected by that voting group are entitled to fill the vacancy.

d. Tenure.

Except as otherwise provided by the articles of organization or by these bylaws, each director shall hold office until the next annual meeting of shareholders or the special meeting in lieu of and thereafter until such director's successor is elected and qualified or until such director sooner dies, resigns, is removed or becomes disqualified.

e. Committees.

The directors may, by vote of a majority of all directors then in office, elect from their number an executive or other committees, provided however that if the articles of organization or these bylaws provide that the number of directors required to take board action is greater than a majority of all directors then in office, then the vote of such greater number shall be required to elect any committee. Except as the directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the directors or in such rules, its business shall be conducted as nearly as may be in the same manner as is provided



by these bylaws for the directors. The directors may delegate to any committee some or all of their powers except those which they are prohibited from delegating by any provision of law or by the articles of organization or these bylaws. Without limitation of the foregoing, a committee may not (a) authorize distributions; (b) approve or propose to shareholders action that is required by law to be approved by shareholders; (c) change the number of the board of directors, remove directors from office or fill vacancies on the board of directors; (d) amend the articles of organization; (e) adopt, amend or repeal the bylaws; or (f) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the board of directors.

f. Meetings.

Regular meetings of the directors may be held without call or notice at such places and at such times as the directors may from time to time determine, provided that any director who is absent when such determination is made shall be given reasonable notice of the determination. Any or all of the directors may participate in a meeting of the directors or of a committee thereof by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting; and participation by such means shall constitute presence in person at any such meeting.

A regular meeting of the directors may be held immediately following the annual meeting of shareholders, or special meeting in lieu thereof, at the same place as such shareholders' meeting. Special meetings of the directors may be held at any time and place designated in a call of the meeting by the chairman of the board, if any, the president or two or more directors.

g. Notice of Special Meetings.

Notice of the date, time and place of all special meetings of the directors shall be given to each director by the secretary, or assistant secretary, or by the officer or one of the directors calling the meeting. Notice shall be given to each director in person, by telephone, voice mail, facsimile telecommunication, telegram or other electronic means sent to his usual or last known business or home address or phone number or by electronic mail to the electronic mail address of the director as last notified to the corporation at least twenty-four (24) hours in advance of the meeting or by mailing it to either such business or home address at least forty-eight (48) hours in advance of the meeting. Notice need not be given to any director if a written waiver of notice, executed by him before or after the meeting, is filed with the records of the meeting, or to any director who attends the meeting without protesting, prior to or at the meeting's commencement, the lack of notice to him. A notice or waiver of notice of a directors' meeting need not specify the purposes of the meeting.

h. Quorum.

At any meeting of the directors, a quorum of the board of directors shall be a majority of the directors in office immediately before the meeting begins. Any meeting may be adjourned



from time to time by a majority of the votes cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice.

i. Action at Meeting.

If a quorum is present when a vote is taken, the vote of a majority of the directors present is an act of the board of directors, unless the articles of organization or these bylaws require the vote of a greater number of directors.

j. Action by Consent.

Any action required or permitted to be taken at any meeting of the directors may be taken without a meeting if all directors then in office consent to the action in a writing signed by each director, or by electronic transmission delivered to the corporation to the address specified by the corporation for the purpose or, if no address is specified, to the principal office of the corporation addressed to the secretary or other officer or agent having custody of the records of proceedings of directors, provided that such written consents and/or electronic transmissions shall be included in the minutes or filed with the corporate records reflecting the action taken. Action taken by written consent is effective when the last director signs or delivers consent, unless the consent specifies a different effective date. Consents given in accordance with this provision shall be treated as a vote of the directors for all purposes.

IV.

OFFICERS

a. Enumeration.

The officers of the corporation shall consist of a president, a treasurer, a secretary, and such other officers, if any, including a chairman and a vice chairman of the board of directors, one or more vice presidents, assistant treasurers and assistant secretaries, as the incorporators at their initial meeting or the directors from time to time may choose or appoint.

b. Appointment.

The president, treasurer and secretary shall be appointed annually by the directors at their first meeting following the annual meeting of shareholders or the special meeting in lieu thereof. Other officers, if any, may be appointed by the board of directors at such meeting or at any other time.

c. Vacancies.

If any office becomes vacant by reason of death, resignation, removal, disqualification or otherwise, the directors may choose a successor or successors, who shall hold office for the



unexpired term, except as otherwise provided by the Act, by the articles of organization or by these bylaws.

d. Qualification.

The president may, but need not be, a director. No officer need be a shareholder. Any two or more offices may be held by the same person. Any officer may be required by the directors to give bond for the faithful performance of his duties to the corporation in such amount and with such sureties as the directors may determine.

e. Tenure.

Except as otherwise provided by the articles of organization or by these bylaws, the president, treasurer and secretary shall hold office until the first meeting of the directors following the annual meeting of shareholders or the special meeting in lieu thereof, and thereafter until such officer's successor is chosen and qualified; and all other officers shall hold office until the first meeting of the directors following the annual meeting of the shareholders or the special meeting in lieu thereof, unless a shorter term is specified in the vote choosing or appointing them, or in each case until such officer sooner dies, resigns, is removed or becomes disqualified.

f. Chairman and Vice Chairman of the Board.

A chairman or vice chairman of the board of directors shall have such powers as the directors may from time to time designate. Unless the board of directors otherwise specifies, the chairman of the board, or in his absence the vice chairman, shall preside at all meetings of the shareholders and of the board of directors. The chairman or vice chairman must be a director.

g. President and Vice President.

Except as otherwise determined by the directors, the president shall be the chief executive officer of the corporation and shall, subject to the direction of the directors, have general supervision and control of its business. Unless the board of directors otherwise specifies, in the absence of the chairman and vice chairman, if any, of the board of directors, the president shall preside, when present, at all meetings of shareholders and of the board of directors.

Any vice president shall have such powers as the directors may from time to time designate.

h. Treasurer and Assistant Treasurers.

The treasurer shall, subject to the direction of the directors, be the chief financial and accounting officer of the corporation, and 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, and



books of account and accounting records. He shall have power to endorse for deposit or collection all notes, checks, drafts, and other obligations for the payment of money payable to the corporation or its order, and to accept drafts on behalf of the corporation.

Any assistant treasurer shall have such powers as the directors may from time to time designate.

i. Secretary and Assistant Secretary.

Unless a transfer agent is appointed, the secretary shall keep or cause to be kept 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 secretary shall record all proceedings of the shareholders in a paper record, or in another form capable of conversion into a paper record within a reasonable time. Such records shall be kept at the principal office of the corporation or at the office of its transfer agent or of the secretary and shall be open at all reasonable times to the inspection of any shareholder.

If a secretary is elected, he shall record all proceedings of the directors in a paper record, or in another form capable of conversion into a paper record within a reasonable time. Any assistant secretary shall have such powers as the directors may from time to time designate. In the absence of the secretary from any meeting of the directors, any assistant secretary, or a temporary secretary designated by the person presiding at such meeting, shall record such proceedings.

j. Other Powers and Duties.

Each officer shall, subject to these bylaws, have in addition to the duties and powers specifically set forth in these bylaws, such duties and powers as are customarily incident to his office, and such duties and powers as the directors may from time to time designate.

V.

RESIGNATIONS AND REMOVALS

a. Resignation.

Any director or officer may resign at any time by delivering his resignation in writing to the chairman of the board, if any, the president, the treasurer or the secretary or to a meeting of the directors. Such resignation shall be effective upon receipt unless specified to be effective at some other time.



b. Removal of Director.

A director (including persons elected by directors to fill vacancies in the board) may be removed from office (a) with or without cause by majority vote of the shareholder voting group entitled to appoint such director, or (b) with cause by vote of the greater of a majority of the directors then in office or of the number of directors otherwise required to take an action of the board, except that if a director is appointed by a voting group of shareholders, only directors appointed by that voting group may vote to remove him. A director may be removed by the shareholders or the directors only at a meeting called for the purpose of removing him and the meeting notice must state that the purpose, or one of the purposes, of the meeting is removal of the director.

c. Removal of Officer.

The directors may remove any officer at any time with or without cause.

d. No Right to Compensation.

No director or officer resigning and (except where a right to receive compensation shall be expressly provided in a duly authorized written agreement with the corporation) no director or officer removed, shall have any right to any compensation as such director or officer for any period following his resignation or removal, or any right to damages on account of such removal, whether his compensation be by the month or by the year or otherwise, unless in the case of a resignation, the directors, or in the case of a removal, the body acting on the removal, shall in their or its discretion provide for compensation.

VI.

SHARES

a. Amount Authorized.

The total number of authorized shares shall be as fixed in the articles of organization.

b. Share Certificates; Statements for Uncertificated Shares.

Shares of the corporation may be certificated or uncertificated. Each shareholder shall be entitled to: (a) for certificated shares, a certificate of the shares of the corporation setting forth the number of shares and the class and the designation of the series in such form as shall, in conformity with law, be prescribed from time to time by the directors; and (b) for uncertificated shares, a written information statement setting forth the number of shares and the class and the designation of the series of the shares. Each certificate shall be signed by any two of the following officers: the president, any vice president, the treasurer, any assistant treasurer, the secretary or any assistant secretary, either by real or facsimile signatures, and may bear the



corporate seal or its facsimile. In case any officer who has signed or whose facsimile signature has been placed on such certificate shall have ceased to be such officer before such certificate is issued, it may be issued by the corporation with the same effect as if he were such officer at the time of its issue.

Every certificate or information statement for shares which are subject to any restriction on transfer pursuant to the articles of organization, the bylaws or any agreement to which the corporation is a party shall have the restriction noted conspicuously on the certificate or information statement and shall also set forth on the face or back either the full text of the restriction or a statement of the existence of such restriction and a statement that the corporation will furnish a copy thereof to the holder of such certificate or statement upon written request and without charge. Every certificate or statement issued when the corporation is authorized to issue more than one class or series of shares shall set forth on its face or back either the full text of the preferences, voting powers, qualifications and special and relative rights of the shares of each class and series authorized to be issued or a statement of the existence of such preferences, powers, qualifications and rights and a statement that the corporation will furnish a copy thereof to the holder of such certificate or statement upon written request and without charge.

c. Permitted Transfers.

Subject to the restrictions, if any, stated or noted on the share certificates or information statements or provided in these bylaws, shares may be transferred on the books of the corporation by: (a) for certificated shares, the surrender to the corporation or its transfer agent of the certificate therefor properly endorsed or accompanied by a written assignment and power of attorney properly executed, with necessary transfer stamps affixed, and with such proof of the authenticity of signature as the corporation or its transfer agent may reasonably require; and (b) for uncertificated shares, by delivery to the corporation or its transfer agent of an instruction with a request to register a transfer properly executed by the transferring shareholder, and with such proof of authenticity of signature as the corporation or its transfer agent may reasonably require. Except as may be otherwise required by the Act, by the articles of organization or by these bylaws, the corporation shall be entitled to treat the record holder of shares as shown on its books as the owner of such shares for all purposes, including the payment of dividends and the right to receive notice and to vote with respect thereto, regardless of any transfer, pledge or other disposition of such shares, until the shares have been transferred on the books of the corporation in accordance with the requirements of these bylaws.

d. Prohibited Transfers.

No shares of stock may be Transferred (i) to a Person that has been, or could reasonably be expected to be, subject to an Adverse Suitability Determination, (ii) if the holder of record of such shares of stock is a “controlling person” (as defined by 935 CMR 500.050) of the corporation, to any Person that is a “controlling person” in any other Person that holds any cannabis license in the Commonwealth of Massachusetts, or (iii) where such Transfer would



result in, or reasonably could be expected to result in, and Adverse Suitability Determination with respect to the corporation.

As used in this Section 4, the following terms shall have the following meanings:

“Adverse Suitability Determination” means, with respect to a Person, a recommendation or determination by a Cannabis Regulatory Body that such Person, its Affiliates, or any of such Person’s or its Affiliates’ respective Representatives is not suitable for licensure in connection with a cannabis business in the Commonwealth of Massachusetts pursuant to 935 CMR 500, 935 CMR 501 or any other provision of law.

“Affiliate” means, with respect to any Person, any Person that controls, is controlled by or is under common control with such Person.

“Cannabis Regulatory Body” means the Massachusetts Cannabis Control Commission, the Massachusetts Department of Public Health, any municipality that regulates cannabis businesses, or the staff of such governmental bodies or any other governmental body.

“Person” shall include any corporation, association, joint venture, partnership, limited partnership, limited liability company, business trust, institution, foundation, pool, plan, government or political subdivision thereof, government agency, trust or other entity or organization or a natural person.

“Representative” means, with respect to a Person, such Person’s officers, directors, employees, members, managers, equity holders, agents, consultants, advisors and representatives.

“Transfer” means any sale, distribution, conveyance, donation, assignment, bequest, gift, pledge or other transfer (including an initial issuance of stock by the corporation), whether voluntary, involuntary, by operation of law or otherwise, of all or any part of any interest in any stock of this corporation.

e. Record Date for Purposes Other Than Meetings.

The directors may fix in advance a time not more than seventy (70) days preceding the date for the payment of any dividend or the making of any distribution to shareholders or the last day on which the consent or dissent of shareholders may be effectively expressed for any purpose, as the record date for determining the shareholders having the right to receive such dividend or distribution or the right to express such consent or dissent. In such case only shareholders of record on such date shall have such right, notwithstanding any transfer of shares on the books of the corporation after the record date. If no record date is fixed, the record date for determining shareholders shall be at the close of business on the day on which the board of directors acts with respect thereto.



f. Replacement of Certificates.

In case of the alleged loss or destruction or the mutilation of a share certificate, a duplicate certificate may be issued in place thereof, upon such terms as the directors may prescribe.

VII.

MISCELLANEOUS PROVISIONS

a. Fiscal Year.

The fiscal year of the corporation shall end on the date determined from time to time by the board of directors.

b. Seal.

The seal of the corporation, if any, shall, subject to alteration by the directors, consist of a flat-faced circular die with the word “Massachusetts”, together with the name of the corporation and the year of its organization cut or engraved thereon.

c. Registered Agent and Registered Office.

The corporation shall continuously maintain in Massachusetts: (a) a registered agent who may be an officer of the corporation or another individual, a domestic corporation or not-for-profit domestic corporation, or a foreign corporation or not-for-profit foreign corporation qualified to do business in Massachusetts; and (b) a registered office, which may, but need not be, the same as any of its places of business. The business office of the registered agent shall also be the registered office of the corporation. The corporation shall record any change of its registered office or registered agent by filing a statement of change with the Secretary of the Commonwealth.

d. Execution of Instruments.

All deeds, leases, transfers, contracts, bonds, notes and other obligations authorized to be executed on behalf of the corporation shall be signed by the chairman of the board, if any, the president or the treasurer except as the directors may generally or in particular cases otherwise determine.

e. Voting of Securities.

Except as the directors may otherwise designate, the president or treasurer may waive notice of, act and 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 the shareholders, members



or other constituent parties of any other corporation, organization or entity in which the corporation holds securities or other type of ownership interest.

f. Corporate Records to be Maintained and Available to All Shareholders.

The corporation shall keep in Massachusetts at the principal office of the corporation, or at an office of its transfer agent, secretary, assistant secretary or registered agent, a copy of the following records: (a) its articles of organization and bylaws then in effect; (b) resolutions adopted by the directors creating classes or series of shares and fixing their relative rights, preferences and limitations, if shares issued pursuant to those resolutions are outstanding; (c) the minutes of all shareholders' meetings, and records of all action taken by shareholders without a meeting, for the past three years; (d) all written communications to shareholders generally during the past three years, including annual financial statements issued pursuant to the Act; (e) a list of the names and business addresses of its current directors and officers; and (f) its most recent annual report delivered to the Massachusetts Secretary of the Commonwealth. Said copies and records may be kept in written form or in another form capable of conversion into written form within a reasonable time. A shareholder is entitled to inspect and copy such records, during regular business hours at the office at which they are maintained, on written notice given at least five business days before the date he wishes to inspect and copy.

g. Indemnification.

The corporation shall, to the fullest extent permitted by law, indemnify each of its directors and officers (including persons who serve at its request as directors, officers, or trustees of another organization in which it has any interest as a shareholder, creditor or otherwise or in any capacity with respect to any employee benefit plan), against all liabilities and expenses, including amounts paid in satisfaction of judgments, in settlement or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer, if: (a) he conducted himself in good faith and in the reasonable belief that his conduct was in the best interests of the corporation or at least not opposed to the best interests of the corporation, and, in the case of any criminal proceeding, he had no reasonable cause to believe his conduct was unlawful; or (b) he engaged in conduct for which he shall not be liable under the articles of organization; provided, however, that the corporation shall not indemnify or advance expenses to any person in connection with any action, suit, proceeding, claim or counterclaim initiated by or on behalf of such person. Such indemnification shall be provided although the person to be indemnified is not currently a director, officer, partner, trustee, employee or agent of the corporation or such other organization or no longer serves with respect to any such employee benefit plan.

Notwithstanding the foregoing, no indemnification shall be provided unless a determination has been made that indemnification is permitted by law for a specific proceeding:



(a) if there are two (2) or more disinterested directors, by the board of directors by a majority vote of all the disinterested directors, a majority of whom for such purpose shall constitute a quorum, or by a majority of the members of a committee of two (2) or more disinterested directors appointed by vote; or

(b) by special legal counsel selected either (i) in the manner prescribed in clause (a) above, or (ii) if there are fewer than two (2) disinterested directors, by the board of directors, in which case directors who do not qualify as disinterested directors may participate in the selection; or

(c) by the holders of a majority of the corporation's outstanding shares at the time entitled to vote for directors, voting as a single voting group, exclusive of any shares owned by or voted under the control of any interested director or officer.

The right of indemnification hereby provided shall not be exclusive of or affect any other rights to which any director or officer may be entitled; nothing contained in this section shall affect any rights to indemnification to which employees, independent contractors or agents, other than directors and officers, may be entitled by contract or otherwise under law. As used in this paragraph, the terms "director" and "officer" include their respective heirs, executors and administrators, and an "interested" director or officer is one against whom in such capacity the proceedings in question or another proceeding on the same or similar grounds is then pending.

Any repeal or modification of the foregoing provisions of this section shall not adversely affect any right or protection of a director or officer of the corporation with respect to any acts or omission of such director or officer occurring prior to such repeal or modification.

h. Advance of Expenses.

The corporation shall, before final disposition of a proceeding, and to the fullest extent permitted by law, advance funds to pay for or reimburse the reasonable expenses incurred by a director, officer or other person who is a party to a proceeding for which he would be or may be entitled to indemnification as set forth in these bylaws, provided that he delivers to the corporation a written affirmation of his good faith belief that he has met the relevant standard of conduct described in these bylaws, and his written undertaking to repay any funds advanced if he is not entitled to mandatory indemnification under applicable law and it is ultimately determined that he has not met the relevant standard for indemnification set forth in these bylaws.

i. Amendments to Bylaws.

These bylaws may at any time be amended by vote of the shareholders or may be amended by vote of a majority of the directors then in office, except that bylaw provisions dealing with quorum or voting requirements for shareholders, including additional voting groups, may not be adopted, amended or repealed by the board of directors. Notice of any change to the



bylaws by the directors, stating the substance of such change, shall be given to all shareholders entitled to vote on amending the bylaws not later than the time that notice of the shareholders' meeting next following such change is required to be given.

j. Director Conflict of Interest.

A conflict of interest transaction is a transaction with the corporation in which a director has a material direct or indirect interest (an "Interested Director"). Without limiting the interests that may create conflict of interest transactions, a director has an indirect interest in a transaction if another entity in which he has a material financial interest or in which he is a general partner is a party to the transaction (a "Related Party"), or if another entity of which he is a director, officer, or trustee or in which he holds another position is a party to the transaction and the transaction is or should be considered by the board of directors of the corporation.

A conflict of interest transaction is not voidable by the corporation solely because of the director's interest in the transaction if: (a) the material facts of the transaction and the director's interest were disclosed or known to the board or a committee of the board, and the board or committee authorized, approved or ratified the transaction by the vote of a majority of the directors on the board or committee who have no direct or indirect interest in the transaction, but a transaction may not be authorized, approved, or ratified by a single director; (b) the material facts of the transaction and the director's interest were disclosed or known to the shareholders entitled to vote and they authorized, approved, or ratified the transaction by the vote of a majority of the shares entitled to vote or (c) the transaction was fair to the corporation. In the case of clause (b) above, shares owned by or voted under the control of any Interested Director or Related Party shall not be entitled to vote.



**FROM:** Frozen 4 Corporation

**TO:** Cannabis Control Commission

**DATE:** May 31st, 2020

**RE:** Plan for Obtaining Liability Insurance for Delivery pre certification

**PLAN:**

Frozen 4 Corporation ("F4C") will obtain liability insurance in compliance with 935 CMR 500.105(10)(a).

The policy will provide coverage of no less than \$1 million dollars per occurrence and \$2 million dollars aggregate, annually. Product liability coverage will be for not less than \$1 million per occurrence and \$2 million in aggregate, annually. The deductible shall be no more than \$5,000 per occurrence.

F4C anticipates securing D&O liability coverage at prevailing rates. F4C also anticipates securing commercial auto coverage at prevailing rates, including enhanced coverage for optional bodily injury, for any F4C vehicles used to transport the product.

F4C will retain the services of a local insurance agent and legal counsel to review and adjust coverages periodically to meet the needs of the company, ensure compliance with CCC regulations, and adequately protect F4C 's assets, personnel and customers.



**FROM: Frozen 4 Corporation**

**TO: Cannabis Control Commission**

**DATE: October 22, 2021**

**RE: Business Plan for Delivery pre certification**

## **BUSINESS PLAN**

### **The Company**

Frozen 4 Corporation ("F4C" or "Company") is a community-based cannabis establishment located at 24 Williams Way, Bellingham, Massachusetts. The Company was formed in 2018 for the sole purpose of securing local and state permits necessary to establish a marijuana cultivation, processing and packaging facility in Massachusetts. With the opening of Delivery-Only and Delivery Endorsement applications for Economic Empowerment Applicants, F4C sought out and was approved for pre-certification for a Delivery-Only License issued by the Massachusetts Cannabis Control Commission ("CCC").

### **Customers**

The mission of F4C is to provide cannabis products to adults intending to use the products in a manner consistent with Massachusetts law. F4C will implement security processes detailed further in the Delivery Plan to verify that all customers are a minimum of 21 years old. The Company will focus on customer safety and experience, and will adhere strictly to CCC regulations as they are periodically amended.

### **Management**

Key members of the management team include:

David Morgan, Chairman

Benjamin C. Virga, President

Lukasz Marut, Director of Products

Andrea Barone, Director of Compliance

Mary-Frances Pinedo, Director of Inventory and Data Management



## **Operations**

F4C plans to enter into Delivery Agreements with various licensed Marijuana Establishment Retailers, either Medical or Adult-Use, in the state of Massachusetts. F4C will pick-up marijuana/marijuana products from the Retailer's locations and deliver them to certified, valid customers over the age of 21, where marijuana retail sales are permitted within state bounds.

F4C will adopt and maintain standard operating procedures ("SOPs") pertaining to corporate and marijuana delivery related procedures. The SOPs will conform to Massachusetts law and regulations set forth in 935 CMR 500, and shall control the performance of all F4C management, visitors, contractors and staff. On an annual basis at minimum, F4C will review, assess and revise the SOPs in order to conform company performance to the applicable regulations and industry best practices.

Business operations will be run out of the Bellingham address (24 William Way) once the operation has more Delivery Agreements, but dispatching operations are taking place remotely as they are heavily computer based. Also, dependent upon the Delivery Agreement(s), vehicles used for delivery may or may not be stored at the Delivery Partners locations. Subject to local approval and consistent with CCC regulations, hours of operation shall be as follows:

Monday	11:00am – 9:00pm
Tuesday	11:00am – 9:00pm
Wednesday	11:00am – 9:00pm
Thursday	11:00am – 9:00pm
Friday	11:00am – 9:00pm
Saturday	11:00am – 9:00pm
Sunday	11:00am – 9:00pm



**FROM: Frozen 4 Corporation**

**TO: Cannabis Control Commission**

**DATE: October 25, 2021**

**RE: F4C Diversity Plan**

### **Diversity Mission**

To encourage the entire community to participate in the Frozen 4 Corporation ("F4C") mission, and to establish specific, measurable goals to promote equity for minorities, women, veterans, LGBTQ+ and people with disabilities.

In efforts to support the above-mentioned groups, F4C has created the following Diversity Plan and has identified and created goals/programs to promote equity in F4C's operations.

### **Goals**

In order for F4C to promote equity for the groups mentioned above within its operations, we have established the following goals:

1. F4C intends to target each demographic in percentages at least equal to the following: women (50%); minorities (20%); veterans (15%); LGBTQ (10%); people with disabilities (10%)
2. At least 60% of F4C's staff in executive / management positions will be women

### **Programs**

F4C has developed the following programs to help achieve its goals to promote diversity and equity in its operations:

#### **1. Recruiting Employees:**

a. F4C will create employment opportunity postings as positions become available (but at least once every calendar year) on diverse job boards such as Indeed, DiversityJobs.com and/or PinkJobs.com.

b. F4C will hold and/or participate in at least one job fair, annually, that is targeted for women, minorities, veterans, disabled, and/or LGBTQ+

- Job Fair, hosted by F4C, to be held within 90 days of receiving Provisional Licensure. Location for the event will be on-site in Bellingham, MA. Job



Fair will be advertised in local papers for Bellingham, Brockton, Taunton, and Framingham.

## 2. Training and Education:

- a. F4C will hold an annual employee training for all staff members in lead, supervisory, management or executive roles to maintain awareness and to continue to promote diversity within the company. These trainings will include a variety of topics, some of which are listed below;
  - i. Prevention of sexual orientation, gender, age and racial biases on institutional and individual levels
  - ii. Procedural overviews of EEO principled hiring, firing, and dispute management
  - iii. Strategy for community and workplace civic engagement to build diverse & inclusive relationships
  - iv. Privilege in leadership; closing the gap by maintaining a diverse management team
  - v. Improving corporate culture through analysis of how effectively F4C's core values integrate issues of cultural competency

## Measurements

F4C will utilize the measurements listed below to assess the proposed programs and goals. The Director of Diversity, Community Outreach and Continuing Education, along with the Director of Compliance and President of F4C, will be responsible for developing and reviewing the measurable outcomes to ensure F4C continues to meet its proposed goals for Diversity every 6 months, but at least annually. At the time of license renewal, F4C will provide the required supporting documentation to demonstrate its success or active progress with the Diversity Plan. F4C will also submit any proposed changes to its Diversity Plan should there be any.

## 1. Recruiting Employees at F4C:

- a. Every 6 months, a workforce diversity report will be generated by HR and reviewed to ensure the following:
  - i. F4C is effective in hiring and maintaining a diverse staff where staff is comprised of women (50%); minorities (20%); veterans (15%); LGBTQ (10%); people with disabilities (10%)
  - ii. That at least 60% of F4C executive/management positions are held by women



- b. A copy of all employment opportunities published on diverse job boards;
- c. Copy of records that prove F4C held itself or attended a job fair held by another company targeted to reach women, minorities, veterans, disabled, and/or LGBTQ+

2. Training at F4C:

- a. Training Records that include the date, time, location, instructor and names of employees that attend the annual training session on Diversity.

**Affirmative Statement**

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans, Frozen 4 Corporation affirmatively states as follows: (1) 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 (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** July 6th, 2020  
**RE:** Energy Compliance Plan

Frozen 4 Delivery is committed to being environmentally conscious and reducing our environmental impact in any way possible. One of the ways Frozen 4 Delivery intends to reduce our carbon footprint is by implementing energy conscious vehicles in the delivery fleet. For larger deliveries and transports, where 5 or more orders are being transported at a time, Frozen 4 will outfit Ford transit vans with XLFleet technology to make them hybrid electric transit vehicles that are shown to be 25% more efficient in terms of miles per gallon with greatly reduced CO2 emissions. Frozen 4 plans to go fully electric-powered once Ford models are available in the United States. For smaller deliveries, where 5 or less customer orders are being transported, fully electric, smaller vehicles will be implemented. Routes taken by delivery team(s) will be planned accordingly to ensure efficiency is maximized and backtracking is avoided. All vehicles in Frozen 4's delivery fleet will meet all the vehicle requirements set forth in 935 CMR 500.105(13), the security requirements pursuant to 935 CMR 500.110(8-10) and be inspected by the CCC prior to use.

On a biannual basis, the vehicles in Frozen 4's delivery fleet will be assessed and evaluated to determine their efficiency in the following ways: the approximate amount of energy/fuel conserved, amount of downtime experienced (if any), and how much capital was saved (or spent) by using the alternative fuel vehicles. Frozen 4 Delivery will continue to evaluate alternative fuel options as long as it is legally operational in the state of Massachusetts.



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** October 25, 2021  
**RE:** Plan for Maintaining of Financial Records for DO100106 Renewal

**PLAN:**

F4C has adopted operating policies and procedures to ensure that financial records are accurate and maintained in compliance with 935 CMR 500.000. Financial records shall be maintained using the following principles:

**Revenue**

Any revenues earned by F4C will be tracked by the CFO using QuickBooks and can be periodically exported. The CFO or a person working at his/her direction will provide and monitor all bookkeeping on a day-to-day basis, utilizing financial tracking software. F4C anticipates retaining a separate tax service to handle quarterly and annual tax filings.

**Confidentiality**

Confidential information, such as manifests containing customer information, will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.

**Financial Record-keeping**

F4C shall adhere to the record-keeping requirements set forth at 935 CMR 500.105(9), including the following:

1. Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles;
2. Maintaining a balance sheet reflecting all assets and liabilities;
3. Maintaining a record of all monetary transactions;
4. Maintaining a chart of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;



5. Tracking all compensation paid to each employee, including any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any;
6. Maintaining records of all deliveries made/completed for each Marijuana Retail License customer

F4C will also separately maintain the following business records: (i) Declarations of insurance coverage and maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); (ii) Records of all fees paid under 935 CMR 500.005 or any other section of the CCC's regulations; and (iii) Records of all fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the CCC's regulations.



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** October 25, 2021  
**RE:** Qualifications & Intended Training for Marijuana Establishment Agents

**PLAN:**

F4C anticipates to hire for the following positions for Delivery-Only operations:

- Director of Inventory and Data Management
- Director of Compliance
- Delivery Manager
- Transporters (Delivery Drivers and Delivery Associates)

Applicants must meet the following qualifications to be considered for employment:

- Must be at least 21 years of age
- Must hold a valid Driver's License
- Have a clean driving record
- Must pass a drug test (marijuana use is not a deterrent for employment at F4C, but is strictly prohibited on company property or while on company time)
- Must be able to pass a comprehensive background check in accordance with 935 CMR 500.800 and 935 CMR 500.802
- Possess general knowledge of the cannabis industry and how to properly handle and inventory marijuana items
- Friendly demeanor and customer service experience preferred
- Willingness to abide by all regulations set forth in 935 CMR 500

All employees will be authorized Registered Marijuana Establishment Agents with the CCC and will be trained in compliance with 935 CMR 500.105(13). Training will be tailored to the roles, responsibilities and job functions of each agent. All new employees shall complete the Responsible Vendor Program within 90 days of being hired as per 935 CMR 500.105(2)(b) in addition to orientation training, introduction to the F4C security program, a review of security responsibilities, and Commission approval after the completion of the Responsible Vendor Program (RVT). The Responsible Vendor Training certificates/documentation will be retained for at least four (4) years for each employee that completes the training in their secure personnel file and will be made available upon request. Delivery Staff will also complete the Delivery Core Curriculum RVT course once it is made available.

Additionally, agents authorized by Frozen 4 Corporation ("F4C") to transport marijuana or marijuana products or oversee transportation operations will be required to complete the following training sessions held by the Director of Inventory & Data Management and the Director of Compliance:

- How METRC and RFID tags are used and tracked in regards to marijuana and marijuana product



- Basic marijuana product knowledge and the regulations on product packaging, labeling and dosing limits
- Training on the areas where delivery is allowed/where F4C is not allowed to deliver marijuana
- How to complete the pre-delivery vehicle checklist to ensure that the vehicles used are functional and safe
- How to keep track of and securely store all marijuana inventory/orders in their possession while on delivery
- How to verify a customers government issued ID for name, age and address
- How to complete the necessary transport logs, chain of custody forms and manifests
- Complete and pass an online Defensive Driving Course/Fleet Driver Training Program, provided by *I Drive Safely*
- Perform simulated practice deliveries under a variety of circumstances
- Training and simulations on how to handle certain customer situations such as complaints and returns
- How to properly wear and deploy the use of body cameras
- How to protect confidential information
- How to clean and maintain transport vehicles to prevent contamination or irreparable damage to both the products being transported and the vehicle itself
- How to document and notify the appropriate F4C executives, the CCC and local law enforcement of any instance of theft, diversion or security breach should they occur

Each F4C transportation agent transporting marijuana products will have access to a F4C issued secure cellular phone to ensure the agent is able to maintain contact with Security personnel at the F4C originating location at all times.

F4C will ensure that all agents are aware of and follow the Firearm Prohibition under 935 CMR 500.105(13)(c)(5). F4C will not tolerate firearms on premises or in transportation vehicles under any circumstance.

All transportation agents will be required to wear an agent registration card on a lanyard, clearly displayed while at the facility or during deliveries as designated under 935 CMR 500.105(13)(g)(2). All transportation agents must possess a valid driver's license at all times while operating a vehicle.

Any agent must fulfill the required eight hours of documented training prior to starting and job duties. The Director of Compliance and HR will share the responsibility of ensuring that all agents meet this requirement.



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** October 25, 2021  
**RE:** Record keeping procedures for DO100106 renewal

**PLAN:**

With guidance from its Chairman & President, Frozen 4, Corp. ("F4C") will maintain all records in compliance with 935 CMR 500.105 (8) and (9). F4C will maintain all records in accordance with generally accepted accounting principles.

All digital records will be redundantly backed up to a cloud-based encrypted secure server, thereby ensuring the integrity of F4C records in the event of a technological failure. The server will be maintained by a third-party IT company. Paper documentation will be stored in secure, fireproof cabinets available only to authorized F4C personnel and the CCC upon request.

**Delivery Manifest Records**

For each delivery, the Marijuana Retailer will generate an accurate manifest in METRC and provide it to F4C prior to leaving the retailer. Upon delivery, both the delivery agents and the receiving customer will sign the METRC manifest, signifying the delivery was completed and was accurate. F4C will keep and maintain the signed delivery manifests in a secure location in the Bellingham, MA office for at least one year to be made readily available upon request.

**Personnel Records**

Employee records will be regularly maintained to satisfy the requirements outlined in 935 CMR 500.105(9)(d).

Each staff member shall have a personnel file maintained in a confidential location by authorized F4C personnel. F4C will maintain that file for at least twelve (12) months after termination of the agent's affiliation with F4C. The file shall include, at a minimum, the following:

- i. All materials submitted to the CCC pursuant to 935 CMR 500.030(2);
- ii. Documentation of reference material verification;



- ii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- iii. 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;
- iv. Documentation of periodic performance evaluations;
- v. A record of any disciplinary action taken;
- vi. Notice of completed responsible vendor training program;
- viii. All background check reports obtained in accordance with 935 CMR 500.030.

F4C shall maintain a record of all personnel policies and procedures including employee handbooks and management and operation records.

#### **Financial and Other Business Records**

F4C shall maintain all corporate records, including provisional and final certificates, insurance policies and declarations, accounting information, host community agreements, evidence of equipment acquisition, ownership and disposition documentation and other corporate records. In accordance with 935 CMR 500.105(9)(e), F4C shall maintain records of the follow items:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

F4C shall maintain, in electronic form in a manner consistent with traditional business accounting practices, documents pertaining to F4C's business operation. These records shall include at minimum:

- A balance sheet;
- Income statements;
- Cash flow statements;
- A statement of all monetary transactions;



- A chart of accounts, including check ledger;
- A collection of payables;
- A collection of receivables;
- Payroll records and any other evidence of compensation;
- Any other records that CCC determines to maintain in the ordinary course of business.

Provisional certificates, final certificates and any other certifications of the establishment shall be posted in a conspicuous place on the near the main entrance of the establishment.

All records will be securely maintained and shall be available upon request to the CCC.

In the event of closure, F4C shall maintain all records must be kept for at least two years in a form and location acceptable to the CCC.

### **Record of Standard Operating Procedures**

Standard operating procedures related to F4C's operations will be updated on an ongoing basis, and not less frequently than annually. The standard operating procedures shall include, at a minimum, the following:

- Security measures in compliance with 935 CMR 500.110;
- Agent security policies, including personal safety and crime prevention techniques;
- Hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana and marijuana products in compliance with 935 CMR 500.105(11)
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Plans for quality control, including delivering product that has been tested for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- Workplace health and safety policies, including a provision that the workplace shall be free to alcohol, smoking, or any form of harassment, intimidation or violence;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
  - Diverted marijuana, which will be reported the Police Department and to the CCC;
  - Engaged in unsafe practices with regard to F4C's operations; or
  - Been convicted of any felony in Massachusetts or like violation in any other state or under the laws of the United States.



- Procedures for the handling of cash on premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old; and
- Policies and procedures to prevent unauthorized access to the premises; including but not limited to unauthorized access by any individual under the age of 21.

### **Incident Reporting Records**

Within seven days, F4C will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report.

Incident reports shall describe the incident in question, and shall indicate F4C's investigation and resolution of the incident. All related documents, including photos and surveillance video related to the incident, will be maintained by F4C for not less than one year or the duration of an open investigation, whichever is longer, and be made available to the CCC and law enforcement authorities upon request.

### **Security Records**

A current list of authorized agents and service personnel that have access to the surveillance room will be available to the CCC upon request.

Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the CCC upon request and will be retained for at least ninety (90) days.

F4C will maintain a visitor sign-in and sign-out record at the facility entrance. The record will include visitors' name, address, firm name if applicable, date, time in and out, and the name of any authorized agents who will be escorting the visitor.

### **Confidentiality**

Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.



**FROM: Frozen 4 Corporation**  
**TO: Cannabis Control Commission**  
**DATE: October 25, 2021**  
**RE: Summary of Personnel Policies and Procedures for DO100106 Renewal**

### **Executive Management**

**Chairman:** The Chairman is appointed by the Board of Directors (the “Board”) of Frozen 4 Corp (F4C). The primary functions of the Chairman are to provide leadership and direction to the Board, facilitate the operations and deliberations of the Board and the satisfaction of the Board’s functions and responsibilities under its mandate, and assume responsibility for the strategic initiatives below:

- Working with the Board and the F4C President to develop the strategy for the company’s future growth;
- Working with the F4C President to identify opportunities for value-enhancing strategic initiatives including acquisitions, joint ventures, and strategically important relationships, as well as the disposition from time to time of non-core assets, and communicating regularly with the F4C President regarding the pursuit of such strategic initiatives;
- Developing and maintaining the Company’s relationships with future strategic partners whose capital, influence and knowledge could add significantly to the Company’s value;
- Working with the F4C President on critical issues related to cannabis industry relationships and strategic alliances.

**President:** The President of Frozen 4 Corp. shall provide overall leadership and vision for F4C. The President will work with and support the executive management team and employees to ensure that F4C is setting reasonable business and community benchmarks, achieving its goals and fulfilling its mission. The President’s duties shall include the following:

- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support F4C’s operations;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- Ensure compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- Prepare and periodically amend a plan to ensure ongoing compliance with the provisions of 935 CMR 500.101(1)(c)(7);



- Prepare and periodically amend a set of detailed written operating procedures to ensure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all F4C records, and making such records available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- Work with the executive management team and the General Manager, to implement a plan to prevent diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Ensure that anti-diversion plans incorporate the use of video monitoring, employee training, written guidance to employees, executive supervision and physical inspection of the premises, among other tactics;
- Work with the executive management team and the General Manager, to implement a diversity plan to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Ensure that each member of the executive management team shall attest by his signature that he has read and understands the requirements of 935 CMR 500.000 et seq., and shall keep a copy of such attestation within the books and records of F4C;
- Lead F4C's interactions with state regulators and municipal officials; and
- Working as the team leader with other executives and employees, to review F4C's business and community objectives, and implement plans to achieve those objectives.

Director of Inventory & Data Management: At least weekly, the Director of Inventory & Data Management shall record an inventory count, and report documentation to the President. Additional IM duties shall include the following:

- Develop and implement comprehensive inventory controls;
- Develop and implement comprehensive reporting policies to meet internal and external reporting requirements;
- Maintain all inventory records; physical and electronic
- Staff and supervise all Delivery positions;
- Handle, store, label and track all inventory; and
- Work with the Security Manager and President to implement safe and compliant transportation protocols, including but not limited to those under 500.050(5)(a).

Director of Compliance: The Director of Compliance shall administer background checks and suitability determinations for all F4C employees. Director of Compliance duties shall include the following:

- Ensure all policies and procedures are in strict adherence with the regulations set forth in 935 CMR 500.000;
- In collaboration with the Security Manager, implement and administer background checks on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;



- In collaboration with the Security Manager and President, uphold the regulations set forth by the commission in 935 CMR 500.000, including routine compliance walk throughs of the facility to be completed not less than once per quarter;
- Review background checks prior to any employee commencing work or being granted access to any F4C facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100;
- Register each employee with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04 for purposes of determining suitability

For purposes of further ensuring employee suitability, the Security Manager shall:

- a. Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
- b. Review any and all criminal disqualifying conditions, offenses, and violations;
- c. Where applicable, review all look back periods for criminal offenses and violations included in 935 CMR 500.802 commencing upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.
- d. Exclude from consideration any juvenile dispositions as a factor for determining suitability.
- e. Analyze all background checks to Massachusetts law, including but not limited to 935 CMR 500.800, inclusive of all tables and exhibits.
- f. Not less frequently than quarterly, review Massachusetts law and CCC regulations and guidelines to determine any change in recommended best practice.
- g. Administer the F4C background check protocol, in accordance with Massachusetts law and regulation, and any guidance provided by the CCC from time to time, including 935 CMR 500.802 and related tables.
- h. Determine whether grounds exist for Mandatory Disqualification or Presumptive Negative Suitability Determination and, in the event a Presumptive Negative Suitability Determination is made, F4C will consider the following factors: (i) time since the incident; (ii) age of the subject at the time of the incident; (iii) nature and specific circumstances of the incident; (iv) sentence imposed and length, if any, of incarceration, if criminal; (v) penalty or discipline imposed, including damages awarded, if civil or administrative; (vi) relationship of offense or incident to nature of work to be performed; (vii) number of offenses or incidents; (viii) whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered; (ix) if criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational



certifications obtained; and (x) any other relevant information, including information submitted by the subject.

Upon finding an adverse determination, a Director of Compliance shall:

- Report the adverse finding to the Security Manager and President immediately;
- Within seven (7) days of such determination, provide the applicant a copy of the background screening report and a final adverse determination letter providing the applicant with instruction relative to the right to dispute the contents of the report and rights to supplement or pursue an appeal to the Suitability Review Commission;
- Document such adverse determination in compliance with all requirements set forth in 935 CMR 500 et seq.; and
- Maintain such determination within F4C personnel records.

Chief Financial Officer: The CFO is responsible for handling all financial aspects of the company, including the following tasks:

- Maintenance of financial records including purchase orders;
- Profit and loss projections;
- Cash management and financial reporting;
- Budget management;
- Payroll funding and management;
- Hiring of tax, accounting, payroll, legal and other professional services; and
- Report generation regarding gross sales, on a daily, monthly and annual basis, in a form and manner determined by the President.

### **Employees**

General Manager: The GM shall supervise all logistical operations, including the handling, transfer, storage and transportation of products. The GM shall serve as a supervisor to all aspects of the facility. GM duties shall include the following:

- Ensure that all equipment, fixtures and furniture are in working order;
- Ensure that employees comply with all security protocols;
- Participate in developing and supervising all logistics, in collaboration with the President and other executives and employees, as required by 935 CMR 500.101(1)(c)(7);
- In collaboration with the President and other members of the executive management team, assure that F4C remain compliant with all general operational requirements as set forth at 935 CMR 500.105; and



- Report to the President and other members of the executive management team with respect to general operations.

Security Manager: The Security Manager is responsible for implementing security policies and procedures for F4C. The Security Manager will maintain, implement, review and amend such policies as required by the business. Security Manager duties shall include the following:

- Ensure compliance with all provisions of 935 CMR 500.110;
- Review and ensure proper maintenance of all security apparatus, including physical, human and technological security methods and equipment;
- Interact with state inspectors and municipal law enforcement authorities;
- Train and supervise security staff;
- Develop a plan for educating employees on the strict anti-diversion policy at F4C;
- Develop, review and supervise the process through which F4C will report security incidents;
- Prepare reports, in written and electronic form, relative to the maintenance of security at F4C, and generate any reports required by regulation to be provided to state regulators or law enforcement;
- Maintain current list of all authorized and registered employees working for F4C;
- Maintain current list of all employees authorized to access designated areas of the facility;
- Lead a working group comprised of the President, GM and any other designated personnel to ensure that current policies and procedures are properly and effectively implemented, integrated, and relevant to ensure the safety of F4C employees and assets;
- Ensure that all personnel complete and satisfy all background checks requirements prior to performing any F4C functionality;
- Provide staffing, shift change and general oversight of security operations; and
- In the event of any suspected diversion incident, perform an internal audit, referencing video surveillance and product tracking software, to locate the time, place and agent involved with the discrepancy, and document and report in accordance with 935 CMR 500.110(1)(m).

Marijuana Establishment Agent: EAs participate in a variety of retail sales, security, inventory, and cleanliness functions. EAs operate under the direction of the General Manager. EAs shall perform the following duties:

- Assure accurate and efficient use of F4C's sale tracking system in compliance with 935 CMR 500.105(8);
- At the direction of the GM, complete all EA training as required by 935 CMR 500.105(2);



- After packaging for sale and transportation, collect the selected product from the product storage area and scan the barcode into the POS system;
- Weigh and package the product for placement into an approved child-resistant package in compliance with 935 CMR 500.105(5);
- Generate and affix a label to the product, and confirming that the label reflects the date, strain name, cannabinoid profile, and all applicable warnings as required by 935 CMR 500.105;
- Comply with 935 CMR 500.105(3), requirements for safe handling of marijuana.

Security Agent: ASAs monitor F4C's security systems. ASAs shall perform the following duties:

- Monitor alarm systems, doors, interior and exterior video cameras, motion sensors and related technology;
- Assure that all employees and others accessing the facility have the appropriate credentials and identification and sign into the security log as needed;
- Assure that only properly authorized individuals are able to gain access to the facility;
- Lead F4C's response in the event of fire, theft, intrusion or other threat to health and safety at the facility;
- Respond and investigate security situations and alarm calls;
- Clearly document any incidents and record details of the conditions in a written report for the Security Manager;
- Monitor all employee entrances to the facility;
- Maintain log books; and
- Provide escorted access as required in restricted areas.

Delivery Agents: Delivery Agents support the daily functionality of the Inventory Manager. Delivery Agents shall perform the following duties:

- Load, transport, and deliver items to clients or businesses in a safe, timely manner.
- Review orders before and after delivery to ensure that orders are complete, the charges are correct, and the customer is satisfied.
- Assist with loading and unloading items from vehicles.
- Provide excellent customer service when answering questions and handling complaints from clients.
- Adhere to assigned routes and follow time schedules.
- Abide by all transportation laws and maintain a safe driving record.
- Prepare reports and other documents relating to deliveries.
- Operate equipment and machines, such as cars, trucks, forklifts, etc.
- Maintain all records relating to inventory, including storage, transfer, audit, package, inventory levels and demand, and other records as required by the business;



- Ensure that product is properly packaged, stored, labeled, maintained and recorded within F4C's electronic and physical systems; and
- Ensure proper storage and disposal of waste in accordance with 935 CMR 500.105(12).

### **Personnel Records**

Personnel records for each employee will be maintained for at least twenty-four (24) months after employee separation from the company. Personnel records shall include, but not be limited to, the following:

- Job description stating duties, authority, responsibilities, qualifications, and supervision;
- Employment agreement, if any;
- Documents related to employee training, including training regarding privacy and confidentiality requirements, and a signed statement of the employee indicating the date, time, and place of such training;
- Documentation relating to compensation, including a statement of graduated compensation by date and pay rate;
- Performance evaluations;
- Disciplinary records, if any;
- Documents relating to background investigation, including CORI reports; and
- All materials required by the Commission pursuant to 935 CMR 500.030(2).

Personnel records will be kept in a secure location to maintain confidentiality and be accessible only to the President, Security Manager, or designees, all of whom shall be members of the executive management team.

### **Professional Conduct**

#### **Standards of Conduct**

F4C is committed to maintaining an environment conducive to the health and well-being of customers, employees and the community. F4C shall endeavor to provide a workplace free from harassment, bullying or discrimination. F4C will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity or any other trait or characteristic protected by law. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to F4C's values and shall provide grounds for discipline, up to and including termination. F4C policies shall prohibit any physical or verbal conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment;



- Has the purpose or effect of unreasonably interfering with an employee's work performance; or
- Adversely affects an employee's employment opportunities.

All F4C employees shall maintain the highest degree of professional behavior. Harassment or discrimination by or against employees is strictly prohibited, and the President shall promptly address any offending conduct.

F4C is committed to maintaining a work environment that is alcohol, smoke and drug free. F4C has adopted this policy to provide a work environment that promotes the safety and productivity of its employees, agents, and visitors.

#### At-Will Employment

Unless otherwise specified in a signed writing executed by the President and the employee, employment at F4C shall be at-will. The employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Each party reserves the right to end the employment.

#### Workplace Attire

Workplace attire must be suitable for each specific role and task. The President and the executive team shall determine appropriate attire, and shall ensure compliance with all workplace attire requirements.

#### Business Hours

The facility shall have the following hours of operation:

Monday:	8:00 am -9:00 pm
Tuesday:	8:00 am -9:00 pm
Wednesday:	8:00 am -9:00 pm
Thursday:	8:00 am -9:00 pm
Friday:	8:00 am -9:00 pm
Saturday:	8:00 am -9:00 pm
Sunday:	8:00am -9:00 pm

Emergency contact information:

Benjamin C. Virga, President  
Phone: 617-990-6653  
Email: bvirga@frozen4llc.com



Lukasz Marut, GM  
Phone: 857-385-6801  
Email: lmarut@frozen4llc.com

## **Compensation and Employment Practices**

### **Standard Employment Practices**

F4C offers competitive wage and benefits packages, and shall develop a workplace culture that values work-life balance, transparent and accessible management, and a work ethic consistent with the cannabis program in Massachusetts.

### **Compensation**

Compensation shall be negotiated on an individual basis. F4C shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by F4C. The President and the executive management team shall determine compensation rates. F4C shall at all times comply with applicable state and federal law in determining employee compensation.

### **Compliance with Law and Regulation**

F4C's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the President shall implement company policies and procedures.

### **Work Schedules**

Work schedules shall be part-time or full-time. Schedules will be set and classified according to the demands of the business. F4C shall develop and implement work schedules that provide necessary duty and personnel coverage. F4C shall determine work schedules to ensure adequate coverage on a daily basis, and to diminish the likelihood of duplicate staffing or overtime coverage.

### **Performance Reviews**

At least annually, all employees shall receive performance reviews. A written review, in a form determined by the President, shall accompany each employee review. Such review shall be signed by the employee, and shall be retained in the personnel files of the company. As determined by the President, reviews shall provide a reasonable evaluation of employee



performance, and may include scoring metrics, narrative content and other performance methodologies.

#### Vacation, Paid Leave and Family Leave Policies

F4C's leave policies will comply with all applicable state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation annually. Leave must be requested at least two weeks in advance and approved by the President or designee. F4C anticipates observing all national holidays, and will elect on an annual basis whether to observe state holidays.

#### Disciplinary Policy

F4C has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the "Steps" policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, F4C shall apply the steps described below:

##### *Step 1: Individual Advice and Counsel*

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

##### *Step 2: Written Warning*

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which F4C will maintain in the personnel file.

##### *Step 3: Final Written Warning*

Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state "Final Warning" in prominent text. The employee will sign the document, a copy of which F4C will maintain in the personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or adversely affecting the health or safety of other employees, the executive may recommend to the President that the employee be removed from the workplace. The President shall act on any such recommendation within forty-eight (48) hours.

##### *Step 4: Termination of Employment*



The last step is termination of employment. F4C reserves the right to terminate if, notwithstanding the steps set forth above, an employee's conduct fails to comport with F4C policies and procedures. F4C reserves the right to terminate without prior notice or disciplinary action. The President must approve termination in writing, a copy of which F4C will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor shall anything in this policy be construed as modifying or altering the at-will employment relationship established between F4C and its employees.

#### Conduct Not Subject to "Steps" Disciplinary Policy

Illegal behavior is not subject to the "Steps" policy, and may be reported to local law enforcement. Intoxication, physical harassment, sexual harassment, bullying, theft, diversion of marijuana or marijuana products, engaging in unsafe practices or misappropriation of intellectual property and like behaviors shall not be subject to the "Steps" policy and may be grounds for immediate termination.

Any agent or employee who has been convicted of or entered into a guilty plea for a felony charge for distribution of a drug to a minor shall not be subject to the "Steps" policy and shall be grounds for immediate termination.

#### Separation of Employment

A separating employee may contact the President or other supervising authority to schedule an exit interview. F4C reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

#### Company Property

A separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, computers, and identification cards. Failure to return items may result in deductions from their final paycheck. An employee may be required to sign a wage deduction authorization form to facilitate the deduction of the cost of unreturned items from the final paycheck.

#### Termination of Employee Benefits

An employee separating from F4C is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

#### COBRA Health Insurance

Health insurance terminates on the last day of the month of employment, unless the employee requests immediate termination of benefits. F4C shall provide information about employee



rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.



**FROM:** Frozen 4 Corporation  
**TO:** Cannabis Control Commission  
**DATE:** October 25, 2021  
**RE:** Quality Control and Testing Procedures for DO100106 Renewal

**PLAN:**

**General Policies**

Frozen 4 Corporation ("F4C") intends to deliver Massachusetts consumers with adult-use marijuana of the highest quality. F4C will do so by implementing strict operational controls and maintaining a sanitary and secure environment for transporting marijuana and marijuana products.

All transport vehicles for delivery will be kept in excellent condition. Safety and operational inspections and professional maintenance will be performed on a regular basis. F4C will ensure that each vehicle's environmental controls are fully functional. Storage and transportation of marijuana and marijuana products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

The driver/passenger area and the storage areas of the vehicles used on a given day will be cleaned and appropriately sanitized at the end of the day to prevent any possible cross contamination and to ensure the storage area is free of pests or debris. Under no circumstances will agents be permitted to store equipment, utensils or personal products in the vehicle or in any other unauthorized manner.

All agents shall be trained in accordance with the requirements for food handlers specified in 105 CMR 300.000. Specifically, any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including, but not limited to maintaining adequate personal cleanliness and washing hands appropriately.

All of F4C's storage containers will be light shielding, airtight and secure to protect the finished products and the agents handling them. Storage and transportation of products will always occur under conditions that protect products against physical, chemical, and microbial contamination, as well as against deterioration of finished products or containers. Containers will be monitored for cleanliness and serviced as necessary.

Any 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 in accordance with 935 CMR 500.105(3). All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana as per 935 CMR 500.105(3)

**Quality Control**

Per regulations, all marijuana must pass independent lab testing prior to reaching Retail Establishments. Prior to picking up any orders for delivery at a Licensed Marijuana Retailer,



F4C will make every effort to ensure that the Marijuana Retailer remains in compliance with all testing regulations set forth on 935 CMR 500.160. F4C will refuse any marijuana product earmarked to be delivered that has not been tested OR that has failed testing at an Independent Testing Laboratory. To align with the standards of *935 CMR 500.160(2)*, F4C shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary. F4C will require that the Marijuana Retail Establishment provide a passing Certificate of Analysis, either physical or electronically, for each of the products in the order that are to be delivered to the customers.