Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC283548

Original Issued Date: 01/20/2022

Issued Date: 01/20/2022

Expiration Date: 01/20/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Gan Or LLC

Phone Number: 410-370-6330

Email Address: itscustom@hotmail.com

Business Address 1: 60 Damon Rd.

Business Address 2:

Business City: Northampton

Business State: MA

Business Zip Code: 01060

Mailing Address 1: 60 Damon Rd.

Mailing Address 2:

Mailing City: Northampton

Mailing State: MA

Mailing Zip Code: 01060

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role:

First Name: Ilya **Last Name:** Tunitskiy **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: Jewish, Russian

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Ilya **Last Name:** Tunitskiy **Suffix:**

Marijuana Establishment Name: Gan Or LLC **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Northampton **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 60 Damon Rd.

Establishment Address 2:

Establishment City: Northampton **Establishment Zip Code:** 01060

Approximate square footage of the Establishment: 3800 **How many abutters does this property have?:** 186

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

Cultivation Tier: **Cultivation Environment:**

FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet **Cultivation Environment:** Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	COM Newspaper Notice Gan OR LLC Attachment A.pdf	pdf	60f98459c7a0ef087bc7e313	07/22/2021
Community Outreach Meeting Documentation	COM Attestation Gan Or LLc.pdf	pdf	60f9845c388d2e0895f72613	07/22/2021
Community Outreach Meeting Documentation	COM Gan OR Town Notice 070721.pdf	pdf	6144afeced983707e971bdd2	09/17/2021
Plan to Remain Compliant with Local Zoning	Plan to remain compliant Gan Or LLC 091721.pdf	pdf	6144b1837cede707aacb0128	09/17/2021

Community Outreach Meeting Documentation	COM Abutter Letter Gan OR scan 1.pdf	pdf	614cbee67736bf07c42f7224	09/23/2021

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Program for Gan Or llc 092321.pdf	pdf	614cc647c12c6607a11b061c	09/23/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:**

First Name: Ilya **Last Name:** Tunitskiy **Suffix:**

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Cert Good Standing Gan Or LLC.pdf	pdf	611a76e9bde213399f812b50	08/16/2021
Bylaws	Bylaws Gan Or LLC.pdf	pdf	611a77cc72db7037f432ea3c	08/16/2021
Articles of Organization	Cert Org Gan Or.pdf	pdf	611a77cdeccced39822bd794	08/16/2021
Department of Revenue - Certificate of Good standing	Cert of Good Standing DOR Gan Or LLC.pdf	pdf	611e9e118aea4607aa2a7a98	08/19/2021
Secretary of Commonwealth - Certificate of Good Standing	Dept Unemployment Assistance Certificate Letter Gan Or LLC.pdf	pdf	6144bcd219da0307d35588b9	09/17/2021

No documents uploaded

Massachusetts Business Identification Number: 001505732

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date

Business Plan	Gan Or Llc Business Plan.pdf	pdf	611a7a17f4f37839b1f323b8	08/16/2021
Proposed Timeline	Proposed Timeline Gan Or LLC 081621.pdf	pdf	611a7a19b6c7ee37de4670e7	08/16/2021
Plan for Liability Insurance	Plan for Obtaining Liability Insurance Gan Or LLC.pdf	pdf	611a7a1b324d4e3994c40626	08/16/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Energy Compliance Plan	Energy Compliance Plan - Cultivation - 081621.pdf	pdf	611a7af4f4f37839b1f323c8	08/16/2021
Inventory procedures	Inventory procedures - Cultivation - 081621.pdf	pdf	611a7af63ae71f37c4743367	08/16/2021
Maintaining of financial records	Maintaining Financial Records - Cultivation - 081621.pdf	pdf	611a7af667158339c0ec6f8e	08/16/2021
Personnel policies including background checks	Personnel Policies - Cultivation - 081621.pdf	pdf	611a7af8b6c7ee37de4670f6	08/16/2021
Restricting Access to age 21 and older	Plan to restrict access 21 - Cultivation - 081621.pdf	pdf	611a7af98a09343989a1da4d	08/16/2021
Policies and Procedures for cultivating.	Policies and Procedures for Cultivation- 081621.pdf	pdf	611a7b2b67158339c0ec6f94	08/16/2021
Prevention of diversion	Prevention of diversion - Cultivation - 081621.pdf	pdf	611a7b2c85b72937d301718f	08/16/2021
Qualifications and training	Qualifications and Training - Cultivation - 081621.pdf	pdf	611a7b2dbde213399f812b9d	08/16/2021
Quality control and testing	Quality control and testing - Cultivation - 081621.pdf	pdf	611a7b2e65a78c37ab331462	08/16/2021
Security plan	Security Plan -Cultivation- 081621.pdf	pdf	611a7b44eccced39822bd7c8	08/16/2021
Storage of marijuana	Storage of Marijuana - Cultivation - 081621.pdf	pdf	611a7b4565a78c37ab331466	08/16/2021
Transportation of marijuana	Transportation of marijuana - Cultivation - 081621.pdf	pdf	611a7b4667158339c0ec6f9c	08/16/2021
Dispensing procedures	Dispensing Procedures - Cultivation - 081621.pdf	pdf	611a7d14c618dd39aab54414	08/16/2021
Diversity plan	Diversity Plan Gan Or 091721.pdf	pdf	6144c4aac12c6607a11adf50	09/17/2021
Record Keeping procedures	Record keeping procedures - Cultivation - 091721.pdf	pdf	614cc763604619079ab7af28	09/23/2021

ATTESTATIONS

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

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close

associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notifcation:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 6:00 PM
Tuesday From: 8:00 AM	Tuesday To: 6:00 PM
Wednesday From: 8:00 AM	Wednesday To: 6:00 PM
Thursday From: 8:00 PM	Thursday To: 6:00 PM
Friday From: 8:00 AM	Friday To: 6:00 PM
Saturday From: 8:00 AM	Saturday To: 6:00 PM
Sunday From: 8:00 AM	Sunday To: 6:00 PM

ATTACHMENT A

Vatican: Pope alert and well a day after intestinal surgery

By FRANCES D'EMILIO
Associated Press

ROME — Pope Francis was "in good, overall condition, alert" and breathing on his own Monday, the Vatican said a day after the pontiff underwent a three-hour operation that involved removing half of his colon.

Francis, 84, is expected to stay in Rome's Gemelli Polyclinic, which has a special suite reserved for popes, for about seven days, assuming no complications, Vatican spokesman Matteo Bruni said.

The Vatican has given few details about the procedure, but an Italian newspaper reported, without citing sources, that surgeons began the operation laparoscopically but ended up having to operate with wider incisions after encountering unspecified complications.

Monday's brief medical bulletin — which came more than 12 hours after the end of Sunday's surgery and contained the first details from the Vatican — mentioned no such complications. The Holy See said the pope needed the procedure because of a narrowing of a portion of his large intestine that doctors say can be quite painful.

When the Vatican announced on Sunday afternoon that Francis had been admitted to hospital, it said the operation had been planned.

"His Holy Father is in good, overall condition, alert and breathing spontaneously," Bruni said in a written statement, adding the operation lasted about three hours.

The procedure generally entails removing the left side of the colon and then joining up the remaining healthy parts of the large intestine. But the Vatican didn't elaborate.

Doctors said a risk of the operation is that the connection between the joined-up parts of the colon can sometimes fail, causing more pain and possibly an infection. Such a failure is very rare but would require another surgery.

Without citing sources or specifying what happened, Rome daily Il Messaggero reported that "complications" arose during the surgery. The newspaper said that led surgeons to switch from working laparoscopically to operating through a larger incision.

Laparoscopy is a surgical procedure often dubbed "keyhole surgery" that typically allows surgeons access with very small incisions. In the kind of surgery the Vatican said the pope was getting, laparoscopy is commonly used, experts have said.

Patients having laparoscopic surgery generally require shorter hospital stays.

Before the Vatican bulletin was released, Cardinal Enrico Feroci said he had heard from another cardinal, Angelo De Donatis, that the pope was doing OK.

"He told me that the pope is well," the Italian news agency ANSA quoted Feroci as saying. De Donatis is the vicar of the Rome diocese.

Get-well messages continued to pour in for the pope. Italian Premier Mario Draghi's office said he "expresses affectionate wishes for a rapid convalescence and quick healing."

TODAY IN HISTORY

The Associated Press

TODAY is Tuesday, July 6, the 187th day of 2021. There are 178 days left in the year.

TODAY'S HIGHLIGHT IN HISTORY:

On July 6, 1854, the first official meeting of the Republican Party took place in Jackson, Michigan.

ON THIS DATE:

In 1777, during the American Revolution, British forces captured Fort Ticonderoga.

In 1885, French scientist Louis Pasteur tested an anti-rabies vaccine on 9-year-old Joseph Meister, who had been bitten by an infected dog; the boy did not develop rabies.

In 1917, during World War I, Arab forces led by T.E. Lawrence and Auda Abu Tayi captured the port of Aqaba from the Ottoman Turks.

In 1933, the first All-Star baseball game was played at Chicago's Comiskey Park; the American League defeated the National League, 4-2.

In 1942, Anne Frank, her parents and sister entered a "secret annex" in an Amsterdam building where they were later joined by four other people; they hid from Nazi occupiers for two years before being discovered and arrested.

In 1944, an estimated 168 people died in a fire that broke out during a performance in the main tent of the Ringling Bros. and Barnum & Bailey Circus in Hartford, Connecticut.

In 1945, President Harry S. Truman signed an executive order establishing the Medal of Freedom.

In 1957, the Harry S. Truman Library, the nation's first presidential library, was dedicated in Independence, Missouri.

In 1971, jazz trumpeter and singer Louis Armstrong died in New York at age 69.

In 1988, 167 North Sea oil workers were killed when explosions and fires destroyed a drilling platform.

In 2005, New York Times reporter Judith Miller was jailed after refusing to testify before a grand jury investigating the leak of undercover CIA operative Valerie Plame's identity (Miller was jailed for 85 days before agreeing to testify).

In 2015, Pope Francis received a hero's welcome in Guayaquil, Ecuador's biggest city, as he celebrated the first public Mass of his South American tour.

TEN YEARS AGO: Jury selection began in the perjury trial of former baseball pitcher Roger Clemens, who was accused of lying under oath to Congress when he denied ever using performance-enhancing drugs during his career (the proceedings ended abruptly in a mistrial; Clemens was later acquitted in a retrial).

FIVE YEARS AGO: President Barack Obama scrapped plans to cut American forces in Afghanistan by half before leaving office.

TODAY'S BIRTHDAYS: The 14th Dalai Lama, Tenzin Gyatso, is 86. Singer Gene Chandler is 81. Country singer Jeannie Seely is 81. Actor Burt Ward is 76. Former President George W. Bush is 75. Actor-director Sylvester Stallone is 75. Actor Fred Dryer is 75. Actor Shelley Hack is 74. Actor Nathalie Baye is 73. Actor Geoffrey Rush is 70. Actor Allyce Beasley is 70. Rock musician John Bazz (The Blasters) is 69. Country singer Nanci Griffith is 68. Retired MLB All-Star Willie Randolph is 67. Jazz musician Rick Braun is 66. Country musician John Jorgenson is 65. Former first daughter Susan Ford Bales is 64. Hockey player and coach Ron Duguay is 64. Actor-writer Jennifer Saunders is 63. Political reporter/moderator John Dickerson is 53. Rapper 50 Cent is 46. Actors Tia and Tamera Mowry are 43. Comedian-actor Kevin Hart is 42. Actor Eva Green is 41. San Diego Padres infielder Manny Machado is 29. NBA star Zion Williamson is 21.

Sudoku

Complete the grid so that every row, column and 3x3 box contains every digit from 1 to 9 inclusively.

	1		2	8			4	5
	5		6	1		2	8	
8				3	7	6		
	7	1		9				6
6	9			7			3	8
3				5		7	9	
		9	7	4				3
	3	7		6	1		5	
1	6			2	8		7	

7/6

DIFFICULTY RATING: ★☆☆☆☆

WONDERWORD®

By DAVID OUELLET

HOW TO PLAY: All the words listed below appear in the puzzle — horizontally, vertically, diagonaly and even backward. Find them, circle each letter of the word and strike it off the list. The leftove- letters spell the **WONDERWORD.**

DINING IN TUSCANY — **Sclution: 10 letters**

O	A	C	C	E	T	S	I	B	R	E	A	D	E	N
I	T	L	T	O	R	T	E	L	L	I	P	L	A	Y
C	I	T	L	A	C	O	L	S	M	E	O	S	S	L
C	L	C	O	E	G	A	S	A	P	P	E	A	S	A
A	L	C	R	D	N	T	L	P	P	M	L	E	P	T
N	O	L	F	O	E	A	E	E	R	M	O	O	M	I
G	B	P	I	W	S	R	Z	A	O	T	C	T	I	N
A	I	E	O	O	B	T	P	N	A	A	I	T	R	I
T	R	C	R	C	E	L	I	M	A	T	L	O	H	L
S	A	O	E	I	A	V	O	N	A	P	R	C	S	L
A	S	R	N	T	N	T	I	E	I	L	A	C	T	E
C	W	I	T	S	S	O	M	L	R	A	G	U	E	N
P	E	N	I	U	N	O	I	N	O	P	I	Z	A	N
N	E	O	N	R	F	O	C	A	C	C	I	A	K	A
A	T	S	A	P	I	O	C	C	U	I	C	C	A	C

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Beans, Bistecca, Bread, Cacciucco, Cannellini, Castagnaccio, Crostini, Fiorentina, Focaccia, Garlic, Italy, Lampredotto, Local, Meat, Olive Oil, Onion, Panzanella, Parmesan, Pasta, Pecorino, Pepper, Ragù, Ribollita, Rustic, Sage, Salami, Salmon, Shrimp, Steak, Stew, Sweet, Tartufo, Tomatoes, Tortelli, Zeppole, Zuccotto

Yesterday's Answer: Designer

To purchase **THE COLLECTED WONDERWORD, Volumes 45 through 62** order online at www.WonderWordBooks.com.

Monday's Puzzle Answer 7/5

1	2	6	8	9	7	5	4	3
4	8	5	2	6	3	1	7	9
9	3	7	1	4	5	6	2	8
7	6	9	5	2	1	8	3	4
5	1	3	4	8	9	2	6	7
2	4	8	3	7	6	9	1	5
3	7	1	9	5	2	4	8	6
8	5	2	6	3	4	7	9	1
6	9	4	7	1	8	3	5	2

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LEGAL NOTICES

Legals

PUBLIC NOTICE
Easthampton Planning Board

In accordance with Mass. General Laws, Chapter 40A, Section 11, notice is hereby given that the Easthampton Planning Board will hold the following public hearing on 7/20/2021 at 6:00pm via remote meeting:

Clovercraft LLC dba Budzee – seeking a Special Permit under Sections 10.10 and 12.9 of the Easthampton Zoning Ordinance to operate as a Marijuana Delivery Operator. Property is located at 17 East Street (Map 110, Lot 10) in the Highway Business (HB) zoning district.

Applications can be viewed online: easthamptonma.gov/planningboard
Any person interested or wishing to be heard on the matter may participate in the remote meeting at the time designated above via Zoom:
Computer/Smart Device (video & audio): zoom.us/join
Phone (audio only): (646) 558-8656
Meeting ID: 838 2138 8562

Jesse Belcher-Timme, Chair,
Easthampton Planning Board
July 6, 13
144569

Legals

NOTICE OF PUBLIC HEARING

Pursuant to M.G.L., the Southampton Planning Board will conduct a Public Hearing on July 21, 2021 at 7 p.m. for a Special Permit Application in accordance with the Stormwater/Erosion Control Bylaw, Sec. XIV. The application is submitted by Ryan and Katelyn Nulph at 83-85 Valley Road, (Map 40, Parcel 43). The meeting will be conducted at Town Hall 1st Floor, 210 College Highway. The application is available from southamptonplanningboard@gmail.com or at the Town Clerk Office.

Paul Diemand, Chair
SOUTHAMPTON PLANNING BOARD
July 6, 13
143317

American Heart Association®
www.heart.org

Legals

JOINT PUBLIC HEARING
AMHERST PLANNING BOARD & COMMUNITY RESOURCES COMMITTEE OF
THE AMHERST TOWN COUNCIL
NOTICE OF PUBLIC HEARING

In accordance with M.G.L. Chapter 40A, the Amherst Planning Board and the Community Resources Committee of the Town Council will hold joint public hearings on Wednesday, July 21, 2021 to consider the following proposed amendments to the Zoning Bylaw and to hear public comment on the proposed amendments. Pursuant to Chapter 20 of the Acts of 2021, this meeting will be conducted via remote means. Members of the public who wish to access the meeting may do so via Zoom or by telephone. No in-person attendance of members of the public will be permitted, but every effort will be made to ensure that the public can adequately access the proceedings in real time, via technological means. A hyperlink to and phone number for the hearing will be posted on the Town's online calendar.

Please click this URL to join or to make public comment: https://amherstma.zoom.us/j/88058361043

Or join or make public comment by phone:
Dial (for higher quality, dial a number based on your current location): 1 646 876 9923; 1 301 715 8592; 1 312 626 6799; 1 346 248 7799; 1 408 638 0968; 1 669 900 6833; 1 253 215 8782
Webinar ID: 880 5836 1043

6:35 PM Zoning Bylaw - Article 3, Use Regulations, Section 3.323, Apartments and Article 12, Definitions
To see if the Town will vote to amend Section 12, Definitions of the Zoning Bylaw, to revise the definition of Apartments by removing the limit on the maximum number of dwelling units per building, to amend Section 3.323, to change the permitting requirement for Apartments from Special Permit to Site Plan Review in the Residential Village Center (R-VC) district and from Site Plan Review to Special Permit in the General Business (B-G), to modify the requirement regarding the size/bedroom count of units, to require that enclosed parking on the first or ground floor be located at the rear of the building and designed to reduce visibility from the public way, and to require that the Principles & Standards of the Design Review Board be applied to all new Apartment buildings.

7:00 PM Zoning Bylaw - Article 3, Use Regulations, Section 3.325, Mixed-use Buildings and Article 12, Definitions
To see if the Town will vote to amend Article 12, Definitions, to add a definition of Mixed-use Buildings, to amend Article 3, Section 3.325, Mixed-use Buildings to remove the definition of mixed-use buildings from Section 3.325, to amend the criteria and standards required for mixed-use buildings, to set criteria to limit the amount of residential use and enclosed parking that would be allowed on the first or ground floor, to set a minimum for the amount of non-residential use, other than enclosed parking, that would be allowed on the first or ground floor, to require any dwelling units or enclosed parking on the first or ground floor to be located towards the rear of the building and designed to reduce visibility from the public right of way, to add a requirement regarding the size/bedroom count of units, and to authorize the Permit Granting Authority to determine which floor is to be considered the first or ground floor for sloping lots and lots with multiple frontages.

7:30 PM Zoning Bylaw - Article 5, Accessory Uses, Section 5.011, Supplemental Dwelling Units
To see if the Town will vote to amend Article 5, Accessory Uses, Section 5.011, Supplemental Dwelling Units, to repeal the existing Section 5.011: Supplemental Dwelling Units and replace it with a new Section 5.011, Accessory Dwelling Units, to change the name of this use category to Accessory Dwelling Units, to increase the maximum square footage allowed per unit to 1,000 square feet, to create a more streamlined permitting pathway, to add design guidelines and to require that the Principles and Standards of the Design Review Board be applied to all new Accessory Dwelling Units.

8:00 PM Zoning Bylaw - Article 7, Parking and Access Regulation
To see if the Town will vote to amend Article 7, Parking and Access Regulations, by amending Section 7.000, to separate the residential uses into two categories, one of which would require two parking spaces per dwelling unit (one family detached dwellings, two family detached dwellings, town houses and subdividable/converted dwellings) and one of which would require adequate parking (apartments, mixed-use buildings, and accessory dwelling units) and to provide criteria for the Permit Granting Authority to determine what would be considered adequate parking

Copies of the text and map of the proposed zoning amendment are available in the Planning Department, Town Hall, Amherst, MA.July 6, 14

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LEGAL NOTICE DEADLINES

Monday's paper.....Friday at 9am
Tuesday's paper.....Friday at 4pm
Wednesday's paper.....Monday at Noon
Thursday's paper.....Tuesday at Noon
Friday's paper.....Wednesday at Noon
Saturday's paper.....Thursday at Noon

Legals

OUTREACH MEETING

San Or LLC, a proposed marijuana manufacturer and cultivator, is giving notice of a Community Outreach Meeting on July 20, 2021, 5:30pm at our address; 60 Damon Rd, 01060, at the end of 80 Damon Rd near Northampton Community Rowing.

This is a small, locally owned company which will not be open to the public, and will comply with all local and state regulations, including nuisance ordinances for odor and light. The meeting will discuss security provisions, preventing diversion, positive impacts, nuisance mitigation, etc. There will be an opportunity for the public to ask questions. If you are unable to attend, please email questions to Ilya at itscustom@hotmail.com
July 6
143991

Legals

COMMUNITY RESOURCES COMMITTEE OF THE AMHERST TOWN COUNCIL

NOTICE OF PUBLIC HEARING

In accordance with M.G.L. Chapter 40A, the Community Resources Committee of the Amherst Town Council will a hold public hearing on Tuesday, July 13, 2021 to consider the following proposed zoning amendment and to hear public comment on the proposed amendment to the Zoning Bylaw. The public hearing will take place in the Town Room at the Amherst Town Hall, 4 Boltwood Avenue, Amherst, MA.

2:00 PM Zoning Bylaw - Official Zoning Map - Map 14A, Parcel 33 Rezoning, North Prospect Street
To see if the Town will vote to amend the Official Zoning Map to extend the General Business District (B-G) to include a vacant parcel of land owned by Town of Amherst, in the vicinity of North Pleasant Street, North Prospect Street, Cowles Lane and Amity Street currently located in the General Residence District (R-G).

Copies of the text and map of the proposed zoning amendment are available in the Planning Department, Town Hall, Amherst, MA.
June 28
July 6
138895

Legals

CITATION ON PETITION FOR FORMAL ADJUDICATION
Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Hampshire Probate and Family Court
15 Atwood Drive
Northampton, MA 01060
(413) 586-8500
Docket No. HS21P0360EA

Estate of: Nancy Riel
Also known as: Nancy Borowski
Date of Death: 08/30/2020
To all interested persons:
A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by: Sylvia A. McMahon of Bernardston, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition. The Petitioner requests that: Sylvia A. McMahon of Bernardston, MA be appointed as Personal Representative of said estate to serve **Without Surety** on the bond in **unsupervised administration**
IMPORTANT NOTICE You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: **10:00 a.m. on the return day of 07/21/2021**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you. UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC) A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.
WITNESS, Hon. Linda S. Fidnick, First Justice of this Court.
Date: June 18, 2021
Michael J. Carey,
Register of Probate
July 6
143895

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 7/20/21

2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.

3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).

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

    a. Date of publication: July 6, 2021

    b. Name of publication: Hampshire Gazette

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

    a. Date notice filed: July 12, 2021

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

    a. Date notice(s) mailed: July 12, 2021

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
    a. The type(s) of ME or MTC to be located at the proposed address;
    b. Information adequate to demonstrate that the location will be maintained securely;
    c. Steps to be taken by the ME or MTC to prevent diversion to minors;
    d. A plan by the ME or MTC to positively impact the community; and
    e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

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

Name of applicant:

Gan Or LLC

Name of applicant's authorized representative:

Ilya Tunitskiy

Signature of applicant's authorized representative:



Gan Or LLC
60 Damon Rd.
Northampton, MA 01060

To: Abutters within 300' of 60 Damon Rd. 01060
and Northampton City Clerk

July 05, 2021

Dear Abutters and City of Northampton,

Gan Or LLC, a proposed marijuana manufacturer and cultivator, is giving notice of a Community Outreach Meeting on July 20, 2021, 5:30pm at the site of our above location (at the end of 80 Damon Rd near Northampton Community Rowing.)

This is a small, locally owned company which will not be open to the public, and will comply with all local and state regulations, including nuisance ordinances for odor and light. The meeting will discuss security provisions, preventing diversion, positive impacts, nuisance mitigation, etc.

There will be an opportunity for the public to ask questions at the meeting. Please observe masks and social distancing if you are not fully vaccinated. If you are unable to attend, please email questions to Ilya at itscustom@hotmail.com

Sincerely,

Ilya Tunitskiy
Owner/Operator

RECEIVED
JUL 12 2021
CITY CLERKS OFFICE
NORTHAMPTON, MA 01060

Planning 7/12/21
Office of Mayor 7/12/21

Gan Or LLC, Northampton; Plan to Remain Compliant with Local Zoning:

Gan Or LLC is located in the Industrial-zoned district of the City of Northampton and attests that it will, remain compliant with all local zoning requirements, including but not limited to the following sections of the Northampton Zoning Bylaw:

Building Regulations, Chapter 145, Articles I-IV, sections § 145-16-30

Building, Electrical, and Plumbing, Signage § 350-7

Extension and alteration § 350-9.2 A.

Off-Street parking requirements, § 350-8.1

Although cannabis facilities are allowed by-right, **which means no special permit is required**, the site does require site plan review, storm water management, and compliance with all buffer zone, wetland, sewer, and waste water compliance requirements.

The duration of the permits are unlimited until a change of use and a new building permit is secured at the location. No other provisions are stipulated locally.

Attachment B,

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Northampton, MA 01060

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Sincerely,

Ilya Tunitskiy
Owner/Operator

RECEIVED
JUL 12 2021
CITY CLERKS OFFICE
NORTHAMPTON, MA 01060

Positive Impact Plan for Gan Or llc

This program will meet the objectives of state law M.G.L. Ch. 94G §4 that requires Licensed Marijuana Establishments to, "...engage in processes and policies that promote and encourage full participation in the regulated cannabis industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities."

The Commission has identified the groups this plan is intended to impact as the following:

- Past or present residents of the geographic ADI, which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact.
- Commission-designated Economic Empowerment Priority applicants;
- Commission-designated Social Equity Program participants;
- Massachusetts residents who have past drug convictions; and
- Massachusetts residents with parents or spouses who have drug convictions.
- The above persons are hereinafter be referred to as the **Primary Target Group (PTG).**

We seek to identify three applicants for licensure in need of help and guidance who fulfills the Primary Target Group (PTG) description, and to provide the applicant direct mentor- to-mentee construction/ land business space development assistance. This applicant shall be connected to **Holyoke.** If other communities that are Areas of Disproportionate Impact (ADIs) as defined by the Commission, are impacted through residence or location of the mentee's intended business operations at that time, this will be noted upon renewal. The availability of this service will be continuously promoted through direct engagement with Social Equity Applicants as Ilya Tunitskiy, owner of Gan Or LLC is in the third Social Equity cohort, Economic Empowerment Applicants, and ADI residents seeking to enter the marijuana industry in MA. Each Cohort has applicant introductions which occur through the Equity program of the CCC and this program will be offered to SE applicants in that cohort by Mr. Tunitskiy. Additionally, if no SE applicants in the third cohort utilizes the services, the program will be promoted in the Holyoke Sun newspaper twice annually.

Acknowledgements

The applicant 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.

No actions taken, or programs instituted by the applicant will violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.
No donation or program to support any specifically named organizations or the furtherance of their goals have been proposed as this is a direct mentor-to-mentee program.
The progress or success of our goals will be documented upon renewal, which occurs one year from provisional licensure, and each year thereafter.

Programs:

Business Development - The Positive Impact Plan will provide access to consulting and ancillary services that can help applicants create and develop robust construction ideas, property search, development strategy, document creation, etc. for developing, permitting, and licensing their cultivation, retail, processing, and delivery businesses. **Goal of 5 hours of design development** will be offered, annually.

Local licensing and permitting - The Positive Impact Plan will provide guidance and direct assistance in the preparation of presentation and submission materials; and advocacy for the projected business to affected communities and municipalities that require either Special Permitting, local licensing, or both, with the **goal of 10 hours annually of local help in Civil Engineer Consultation/ Construction Sense/ Material Acquisition, and Tradesmen acquisition.**

State licensing - The Positive Impact Plan will provide direct assistance in the development and preparation of building permits, assistance in property due diligence, other construction documents, and submission of relevant license applications with a **goal of 10 hours annually of consultation/preparatory services.**

Compliance - The Positive Impact Plan will provide architectural consultation and building design support during the post- provisional to "commence operations" phases of licensing. These services will help PTG applicants more effectively make the difficult transition to the challenging construction stages of the regulated cannabis industry. We will provide a **goal of 20 hours assistance annually.**

Ancillary/Employment - If the mentee is unable to secure funding for a marijuana business then the plan will provide ancillary business and career guidance in using the skills they have developed to bring services to their ADIs with a goal of two 90minute seminars hosted at Gan Or llc Business Location (COVID Permitting) or remotely via video for SE Applicants, with a professional Cannabis business consultant and

prospective lenders. This service will be advertised in the Holyoke Sun twice annually if no SE applicant participates in the program.

Goals:

The goal of the program is to provide PTG applicants with direct access to the same professional consulting services enjoyed by (generally) better-financed applicants. These services will provide direct assistance in the achievement of some or all of the following milestones:

- Construction Plan Development (goal; completion of **site plan development**)
- Preparation, support, presentation, and support towards construction info for Special Permit hearings (where applicable) with a goal of **one Special Permit achieved**
- Direct assistance in the preparation of Architectural Drawings for submission to the Commission with the goal of assistance in **one full suite of documents** to mentee for application in each license category for architectural review limited to a 7000 square ft facility or smaller.
- Direct assistance in the preparation and correlation of uploading and preparing supporting documentation for submission to the Inspectors and or Building Department (goal of 10 hours of Building/Health Dept./ other Town Hall assistance.)
- Provide PTG participants easy access to expert mentorship and counseling through individual conference calls with leading industry consultants, material suppliers, trade specialists and ancillary professionals with goal of 8 hours of conference calls

Measurements and Metrics:

Program Progress and Success - The success and impact of this program will be measured through the following means:

- **Targeting** - Did the applicant meet the criteria to be considered part of the Primary Target Group in accordance with the Commission's definition as described in the introduction above?
- **Milestones** - Was the applicant provided assistance in the achievement of at least 3 of the Goals above?
- **Assistance** - Was the applicant provided a goal of 10 hours of direct technical construction consulting support in any or all of the four principal program elements?

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

May 19, 2021

TO WHOM IT MAY CONCERN:

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

GAN OR LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **May 5, 2021.**

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

I also certify that the names of all managers listed in the most recent filing are: **ILYA TUNITSKIY**

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

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **NONE**

In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Processed By:IL

BY-LAWS

of

Gan Or, LLC

ARTICLE I

Articles of Organization

The name and purposes of the corporation shall be as set forth in the Articles of Organization. These By-Laws, the powers of the corporation and its Directors and stockholders, and all matters concerning the conduct and regulation of the business of the corporation, shall be subject to such provisions in regard thereto, if any, as are set forth in the Articles of Organization. All references in these By-Laws to the Articles of Organization shall be construed to mean the Articles of Organization of the corporation as from time to time amended or restated.

ARTICLE II

Fiscal Year

Except as from time to time otherwise determined by the Director(s), the fiscal year of the corporation shall end each year on December 31st.

ARTICLE III

Meetings of Stockholders

Section I. Annual Meetings.

The annual meeting of the stockholders shall be held on the second Tuesday in March of each year (or if it be a legal holiday in the place where the meeting is to be held, on the next succeeding full business day) at 10:00 o'clock A.M. unless a different hour is fixed by the Board of Directors or the President. The purposes for which the annual meeting is to be held, in addition to those prescribed by law, by the Articles of Organization or by these By-Laws, may be

specified by the Board of Directors of the President. If no annual meeting has been held on the date fixed above, a special meeting in lieu thereof may be held and such special meeting shall have for the purposes of these By-Laws or otherwise all the force effect of an annual meeting.

Section 2. Special Meetings.

A special meeting of the stockholders may be called at any time by the president, or by majority of the Directors acting by vote or by written instrument or instruments signed by them. A special meeting of the stockholders shall be called by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by any other officer, upon written application of one or more stockholders who hold at least one-tenth part in interest of the stock entitled to vote at the meeting. Such call shall state the time, place, and purposes of the meeting.

Section 3. Place of Meetings.

All meetings of the stockholders shall be held at the principal office of the corporation in Massachusetts, unless a different place within Massachusetts or, if permitted by the Articles of Organization, elsewhere within the United States as designated by the President, or by a majority of the Directors acting by vote or by written instrument or instruments signed by them. Any adjourned session of any meeting of the stockholders shall be held at such place within Massachusetts or, if permitted by the Articles of Organization, elsewhere within the United States as is designated in the vote of adjournment.

Section 4. Notice of Meetings.

A written notice of the place, date and hour of all meetings of stockholders stating the purposes of the meeting shall be given at least seven days before the meeting to each stockholder entitled to vote thereat and to each stockholder who is otherwise entitled by law of by the Articles of Organization to such notice, by leaving such notice with him or at his residence or

usual place of business, or by mailing it, postage prepaid, and addressed to such stockholder at his address as it appears in the records of the corporation. Such notice shall be given by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by any other officer or by a person designated either by the Secretary, by the person or persons calling the meeting or by the Board of Directors. Whenever notice of a meeting is required to be given a stockholder under any provision of law, of the Articles of Organization, or of these By-Laws, a written waiver thereof, executed before or after the meeting by such stockholder or his attorney thereunto authorized, and filed with the records of the meeting, shall be deemed equivalent to such notice.

Section 5. Quorum.

At any meeting of the stockholders, a quorum shall consist of a majority in interest of all stock issued and outstanding and entitled to vote at the meeting; except that if two or more classes or series, then in the case of each such classes or series a quorum for that matter shall consist of a majority in interest of all stock of that class or series issued and outstanding; and except when a larger quorum is required by law, by the Articles of Organization or by these By-Laws. Stock owned directly or indirectly by the corporation, if any, shall not be deemed outstanding for this purpose. Any meeting may be adjourned from time to time by a majority of the votes properly cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice, providing that a quorum is present at said adjourned time.

Section 6. Action by Vote.

When a quorum is present at any meeting, a plurality of the votes properly cast for election to any office shall elect to such office, and a majority of the vote properly cast upon any

question other than an election to an office shall decide the question, except when a larger vote is required by law, by the Articles of Organization or by these By-Laws. No ballot shall be required for any election unless requested by a stockholder present or represented at the meeting and entitled to vote in the election.

Section 7. Voting.

Stockholders entitled to vote shall have one vote for each share of stock entitled to vote held by them or recorded according to the records of the corporation and a proportionate vote for a fractional share, unless otherwise provided by the Articles of Organization. The corporation shall not, directly or indirectly, vote any share of its own stock.

Section 8. Action by Consent.

Any action required or permitted to be taken at any meeting of the stockholders may be taken without a meeting if all stockholders entitled to vote on the matter consent to the action in writing and the written consents are filed with the records of the meetings of stockholders. Such consents shall be treated for all purposes as a vote at a meeting.

Section 9. Proxies.

Stockholders entitled to vote may vote either in person or by proxy in writing dated not more than six months before the meeting named therein, which proxies shall be filed with the Secretary or the person responsible to record the proceedings of the meeting before being voted. Unless otherwise specifically limited by their terms, such proxies shall entitle the holders thereof to vote at any adjournment of such meeting but shall not be valid after the final adjournment of such meeting. A proxy with respect to stock held in the name of two or more persons shall be valid if executed by any one of them unless at or prior to exercise of the proxy the corporation receives a specific written notice to the contrary from any one of them. A proxy purporting to be

executed by or on behalf of a stockholder shall be deemed valid unless challenged at or prior to its exercise and the burden of proving invalidity shall rest on the challenger.

ARTICLE IV

Directors

Section 1. Powers.

The business of the corporation shall be managed by a Board of Directors who shall have and may exercise all the powers of the corporation except as otherwise reserved to the stockholders by law, by the Articles of Organization or by these By-Laws. In the event of a vacancy in the Board of Directors, the remaining Directors, except as otherwise provided by law, may exercise the powers of the full Board until the vacancy is filled.

Section 2. Enumeration, Election and Term of Office.

The Board of Directors shall consist of not less than three (3) Directors, until such time as the stockholders agree unanimously, or until the death or disability of a Director. The number of the Directors shall be as determined from time to time by the stockholders and may be enlarged by vote of a majority of the Directors then in office. The Directors shall be chosen at the annual meeting of the stockholders by such stockholders as have the right to vote thereon, and each shall hold office until the next annual election of Directors and until his successor is chosen and qualified or until he sooner dies, resigns, is removed or becomes disqualified. No Director need be a stockholder.

Section 3. Regular Meetings.

Regular meetings of the Board of Directors may be held at such times and places within or without the Commonwealth of Massachusetts as the Board of Directors may fix from time to time and, when so fixed, no notice thereof need be given, provided that any Director who is

absent when such times and places are fixed shall be given notice of the fixing of such times and places. The first meeting of the Board of Directors following the annual meeting of the stockholders may be held without notice immediately after and at the same place as the annual meeting of the stockholders or the special meeting held in lieu thereof. If in any year a meeting of the Board of Directors is not held at such time and place, any action to be taken may be taken at any later meeting of the Board of Directors with the same force and effect as if held or transacted at such meeting.

Section 4. Special Meetings.

Special meetings of the Directors may be held at any time and at any place designated in the call of the meeting, when called by the President or the Treasurer or by two or more Directors, reasonable notice thereof being given to each director by the Secretary or an Assistant Secretary, or, if there be none by the Secretary or an Assistant Secretary, by the officer or one of the Directors calling the meeting.

Section 5. Notice.

It shall be reasonable and sufficient notice to a Director to send notice by mail at least forty-eight hours or by telegram at least twenty-four hours before the meeting addressed to him at his usual or last known business or residence address or to give notice to him in person or by telephone at least twenty-four hours before the meeting. Notice of a meeting 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 thereto or at its commencement the lack of notice to him. Neither notice of a meeting nor a waiver of a notice need specify the purposes of the meeting.

Section 6. Quorum.

At any meeting of the Directors, a quorum for any election or for the consideration of any question shall consist of all of the Directors then in office. Whether or not a quorum is present any meeting may be adjourned from time to time by a majority of the votes properly cast upon the question, and the meeting may be held as adjourned without further notice. When a quorum is present at any meeting, the votes of a majority of the Directors present shall be requisite and sufficient for election to any office and shall decide any question brought before such meeting, except in any case where a larger vote is required by law, by the Articles of Organization or by these By-Laws.

Section 7. 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 the Directors consent to the action in writing and the written consents are filed with the records of the meetings of the Directors. Such consent shall be treated for all purposes as a vote of the Directors at a meeting.

Section 8. Committees.

The Board of Directors, by vote of a majority of the Directors then in office, may elect from its number an Executive Committee or other committees and may delegate thereto some or all of its powers except those which by law, by the Articles of Organization, or by these By-Laws may not be delegated. Except as the Board of Directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the Board of Directors or in such rules, its business shall be conducted so far as possible in the same manner as is provided by these By-Laws for the Board of Directors. All members of such committees shall hold such offices at the pleasure of the Board of Directors. The Board of

Directors may abolish any such committee at any time. Any committee to which the Board of Directors delegates any of its powers or duties shall keep records of its meetings and shall upon request report its action to the Board of Directors. The Board of Directors shall have power to rescind any action of any committee, but no such rescission shall have retroactive effect.

ARTICLE V

Officers and Agents

Section 1. Enumeration; Qualification.

The officers of the corporation shall be a President, Treasurer, a Secretary, and such other officers, if any, as the incorporators at the initial meeting, or the Directors from time to time, may in their discretion elect or appoint. The corporation may also have such agents, if any, as the incorporators at their initial meeting, or the Directors from time to time, may in their discretion appoint. Any officer may be, but none need be a Director or stockholder. The Secretary shall be a resident of Massachusetts unless the corporation has a resident agent appointed for the purpose of service of process. 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 amounts and with such sureties as the Directors may determine. The premiums for such bonds may be paid by the corporation.

Section 2. Powers.

Subject to law, to the Articles of Organization and to the other provisions of these By-Laws, each officer shall have, in addition to the duties and powers herein set forth, such duties and powers as the Directors may from time to time designate.

Section 3. Election.

The President, the Treasurer and the Secretary shall be elected annually by the Directors at their first meeting following the annual meeting of the stockholders. Other officers, if any, may be elected or appointed by the Board of Directors at said meeting or at any other time.

Section 4. Tenure.

Except as otherwise provided by law or by the Articles of Organization or by these By-Laws, the President, the Treasurer and the Secretary shall hold office until the first meeting of the Directors following the next annual meeting of the stockholders and until their respective successors are chosen and qualified, and each other officer shall hold office until the first meeting of the Directors following the next annual meeting of the stockholders and until their respective successors are chosen and qualified, unless a different period shall have been specified by the terms of his election or appointment, or in each case until he sooner dies, resigns, is removed or becomes disqualified. Each agent shall retain his authority at the pleasure of the Directors.

Section 5. President and Vice-Presidents.

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the Board of Directors, have general supervision and control of its business. Unless otherwise provided by the Board of Directors, he shall preside, when present, at all meetings of stockholders and of the Board of Directors.

Any Vice-President shall have such powers and shall perform such duties as the Board of Directors may from time to time designate.

Section 6. Treasurer and Assistant Treasurer.

The Treasurer shall, subject to the direction of the Board of Directors, have general charge of the financial affairs of the corporation and shall cause to be kept accurate books of account. He shall have custody of all funds, securities, and valuable documents of the corporation, except as the Board of Directors may otherwise provide.

Any Assistant Treasurer shall have such powers and perform such duties as the Board of Directors may from time to time designate.

Section 7. Secretary and Assistant Secretaries.

The Secretary shall keep a record of the meetings of stockholders and directors. In the absence of the Secretary from any meeting of stockholders or directors, an Assistant Secretary designated by the person presiding at the meeting, shall perform the duties of the Secretary.

ARTICLE VI

Resignations, Removals and Vacancies

Section 1. Resignations.

Any Director or officer may resign at any time by delivering his resignation in writing to the President or the Secretary or to a meeting of the Directors. Such resignation shall take effect at such time as is specified therein, or if no such time is so specified, then upon delivery thereof.

Section 2. Removals.

Directors, including Directors elected by the Directors to fill vacancies in the Board, may be removed with or without assignment of cause by unanimous vote of the holders of the shares entitled to vote in the election of Directors, provided that the Directors of a class elected by a particular class of stockholders may be removed only by the vote of the holders of a majority of

the shares of the particular class of stockholders entitled to vote for the election of such Directors.

The Directors may by vote of a majority of the Directors then in office remove any Director for cause.

The Director may remove any officer from office with or without assignment of cause by vote of a majority of the Directors then in office.

If cause is assigned for removal of any Director or officer such Director or officer may be removed only after a reasonable notice and opportunity to be heard before the body proposed to remove him.

The Directors may by unanimous vote terminate or modify the authority of any agent or employee.

Except as the Directors may otherwise determine, no Director or officer who resigns or is 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, provided, however, that the foregoing provisions shall not prevent such Director or officer from obtaining damages for breach of any contract of employment legally binding upon the corporation.

Section 3. Vacancies.

Any vacancy in the Board of Directors, including a vacancy resulting from an enlargement of the Board, may be filled by vote of a majority of the Directors then in office or, in the absence of such election by the Directors, by the stockholders at a meeting called for the purpose; provided, however, that any vacancy resulting from action by the stockholder may be filled by the stockholder at the same meeting at which such action was taken by them.

If the office of any officer becomes vacant, the Directors may elect or appoint a successor by unanimous vote.

Each such successor shall hold office for the unexpired term of his predecessor and until his successor shall be elected or appointed and qualified, or until he sooner dies, resigns, is removed or becomes disqualified.

ARTICLE VII

Indemnification of Directors and Others

The corporation shall, to the extent legally permissible, indemnify any person serving or who has served as a Director or officer of the corporation, or at its request as a Director, Trustee, Officer, Employee or other Agent of any organization in which the corporation owns shares or of which it is a creditor against all liabilities and expenses, including amounts paid in satisfaction of judgments, in compromise 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 serving or thereafter, by reason of his being or having been such a Director, Officer, Trustee, Employee or Agent, except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation; provided, however, that as to any matter disposed of by a compromise payment by such Director, Officer, Trustee, Employee or Agent, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless:

(a) Such compromise shall be approved as in the best interests of the corporation, after notice that it involves such indemnification:

(i) by a disinterested majority of the Directors then in office; or

(ii) by the holders of a majority of the outstanding stock at the time entitled to vote for Directors, voting as a single class, exclusive of any stock owned by any interested Director or officer; or

(b) In the absence of action by disinterested directors or stockholders, there has been obtained at the request of a majority of the Directors then in office an opinion in writing of independent legal counsel to the effect that such Director or officer appears to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation.

Expenses including counsel fees, reasonably incurred by any such Director, Officer, Trustee, Employee or Agent in connection with the defense or disposition of any such action, suit or other proceeding may be paid from time to time by the corporation in advance of the final disposition thereof upon receipt of an undertaking by such individual to repay the amounts so paid to the corporation if it is ultimately determined that indemnification for such expenses is not authorized under this section. The right of indemnification hereby provided shall not be exclusive of or affect any other rights to which any such Director, Officer, Trustee, Employee or Agent may be entitled. Nothing contained in this Article shall affect any rights to indemnification to which corporate personnel other than such Directors, Officers, Trustees, Employees or Agents may be entitled by contact or otherwise under law. As used in this Article, the terms "Director", "Officer", "Trustee", "Employee" and "Agent" include their respective heirs, executors and administrators, and an "interested" Director, Officer, Trustee, Employee or Agent is one against whom in such capacity the proceedings in question or other proceedings on the same or similar grounds is then pending.

ARTICLE VIII

Stock

Section 1. Stock Authorized.

The total number of shares and the par value, if any, of each class of stock which the corporation is authorized to issue, and if more than one class is authorized, a description of each class with the preferences, voting powers, qualifications and special and relative rights and privileges as to each class and any series thereof, shall be as stated in the Articles of Organization.

Section 2. Issue of Authorized Unissued Capital Stock.

Any unissued capital stock from time to time authorized under the Articles of Organization may be issued by vote of the Directors. No such stock shall be issued unless the cash, so far as due, or the property, services or expenses for which it was authorized to be issued, has been actually received or incurred by, or conveyed or rendered to, the corporation, or is in its possession as surplus.

Section 3. Certificates of Stock.

Each stockholder shall be entitled to a certificate in form selected by the Board of Directors stating the number and the class and the designation of the series, if any, of the shares held by him. Such signatures may be facsimiles if the certificate is signed by a transfer agent, or by a registrar, other than a Director, officer or employee of the corporation.

Every certificate for shares of stock subject to any restriction or transfer pursuant to the Articles of Organization, these By-Laws, or any agreement to which the corporation is a party shall have the restriction noted conspicuously on the certificate 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 to the holder of such certificate upon written request and without charge. Every certificate issued when the corporation is authorized to issue more than one class or series of stock shall set forth on its face or back either the full text or the preferences, voting powers, qualifications and rights, and a statement that the corporation will furnish a copy thereof to the holder of such certificate upon written request and without charge.

Section 4. Transfers.

Subject to the restrictions, if any, imposed by the Articles of Organization, these By-Laws or any agreement to which the corporation is a party, shares of stock shall be transferred on the books of the corporation only by the surrender to the corporation or its transfer agent of the certificate representing such shares properly endorsed or accompanied by a written assignment of such shares or by a written power of attorney to sell, assign, or transfer such shares, properly executed, with necessary transfer stamps affixed, and with such proof that the endorsement, assignment or power of attorney is genuine and effective as the corporation or its transfer agent may reasonably require. Except as may be otherwise required by law, the corporation shall be entitled to treat the record holder of stock as shown on its books as the owner of such stock for all purposes, including the payment of dividends and the right to vote with respect thereto, regardless of any transfer, pledge or other disposition of such stock, until the shares have been transferred on the books of the corporation in accordance with the requirements of these By-Laws. It shall be the duty of each stockholder to notify the corporation of his post office address.

Section 5. Lost, Mutilated, or Destroyed Certificates.

Except as otherwise provided by law, the Board of Directors may determine the conditions upon which a new certificate of stock may be issued in place of any certificate alleged to have been lost, mutilated or destroyed. It may, in its discretion, require the owner of a lost, mutilated or destroyed certificate, or his legal representative, to give a bond, sufficient in its opinion, with or without surety, to indemnify the corporation against any loss or claim which may arise by reason of the issue of a certificate in place of such lost, mutilated or destroyed stock certificate.

Section 6. Transfer Agent and Registrar.

The Board of Directors may appoint a transfer agent or a registrar or both for its capital stock or any class or series thereof and require all certificates for such stock to bear the signature or facsimile thereof of any such transfer agent or registrar.

Section 7. Setting Record Date and Closing Transfer Records.

The Board of Directors may fix in advance a time not more than sixty days before (i) the date of any meeting of the stockholders or (ii) the date for the payment of any dividend or the making of any distribution to stockholders or (iii) the last day on which the consent or dissent of stockholders may be effectively expressed for any purpose, as the record date for determining the stockholders having the right to notice and to vote at such meeting, or the right to receive such dividend or distribution, or the right to give such consent or dissent. If a record date is set, only stockholders of record on the date shall have such right notwithstanding any transfer of stock on the records of the corporation after the record date. Without fixing such record date, the Board of Directors may close the transfer records of the corporation for all or any part of such sixty day period.

If no record date is fixed and the transfer books are not closed, then the record date for determining stockholders having the right to notice of or to vote at a meeting of stockholders shall be at the close of business on the day next preceding the day on which notice is given, and the record date for determining stockholders for any other purpose shall be at the close of business on the day on which the Board of Directors acts with respect thereto.

ARTICLE IX

Miscellaneous Provisions

Section 1. Execution of Papers.

All deeds, leases, transfers, contracts, bonds, notes, releases, checks, drafts and other obligations authorized to be executed on behalf of the corporation shall be signed by the President or the Treasurer except as the Directors may generally or in particular cases otherwise determine.

Section 2. Voting of Securities.

Except as the Directors may generally or in particular cases otherwise specify, the President or the Treasurer may on behalf of the corporation vote or take any other action with respect to shares of stock or beneficial interest of any other corporation, or of any association, trust or firm, of which any securities are held by this corporation, and may appoint any person or persons to act as proxy or attorney-in-fact for the corporation, with or without power of substitution, at any meeting thereof.

Section 3. Corporate Seal.

The seal of the corporation shall be a circular die with the name of the corporation, the word "Massachusetts" and the year of its incorporation cut or engraved thereon, or shall be in such other form as the Board of Directors may from time to time determine.

Section 4. Corporate Records.

The original, or attested copies, of the Articles of Organization, By-Laws and records of all meetings of the Incorporators and stockholders, and the stock and transfer records, which shall contain the names of all stockholders and the record address and the amount of stock held by each, shall be kept in Massachusetts at the principal office of the corporation, or at an office of its transfer agent or of its Secretary or of its Resident Agent. Said copies and records need not all be kept in the same office. They shall be available at all reasonable times to the inspection of any stockholder for any proper purpose but not to secure a list of stockholders for the purpose of selling said list or copies thereto or of using the same for a purpose other than in the interest of the applicant, as a stockholder, relative to the affairs of the corporation.

Section 5. Evidence of Authority.

A certificate by the Secretary or Assistant Secretary as to any matter relative to the Articles of Organization, By-Laws, records, Board of Directors, or any committee of the Board of Directors, or stock and transfer records or as to any action taken by any person or persons as an officer or agent of the corporation, shall as to all persons who rely thereon in good faith be conclusive evidence of the matters so certified.

ARTICLE X

Amendments

These By-Laws may be amended or repealed in whole or in part by the unanimous vote of the holders of the shares of each class of the capital stock at the time outstanding and entitled to vote at any annual or special meeting of stockholders, provided that notice of the substance of the proposed amendment is stated in the notice of such meeting. If authorized by the Articles of Organization, the Directors by unanimous vote may make, amend or repeal the By-Laws, in

whole or in part, except with respect to any provision thereof which by law, the Articles of Organization or the By-Laws requires action by the stockholders. Not later than the time of giving notice of the meeting of stockholders next following the making, amending or repealing by the Directors of any By-Law, notice thereof stating the substance of such change shall be given to all stockholders entitled to vote on amending the By-Laws. No change in the date fixed in these By-Laws for the annual meeting of stockholders may be made within sixty days before the date fixed in these By-Laws, and in case of any change in such date, notice thereof shall be given to each stockholder in person or by letter mailed to his last known post office address at least twenty days before the new date fixed for such meeting.

Any By-Law adopted, amended or repealed by the Directors may be repealed, amended or reinstated by the stockholders entitled to vote on amending the By-Laws.

ARTICLE XI

Repayment Arrangement

Any payment paid to an officer of the corporation such as a salary, commission, bonus, interest, or rent, for entertainment expense incurred by him, which shall be disallowed in whole or in part as a deductible expense by the Internal Revenue Service, shall be reimbursed by such officer to the corporation to the full extent of such disallowance. It shall be the duty of the Directors, as a Board, to enforce payment of each such amount disallowed. In lieu of payment by the officer, subject to the determination of the Directors, proportionate amounts may be withheld from his or her future compensation payments, until the amount owed to the corporation has been recovered.

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $500.00

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

Certificate of Organization
(General Laws, Chapter)

Identification Number: 001505732

1. The exact name of the limited liability company is: GAN OR LLC

2a. Location of its principal office:
No. and Street: 0 NORTH KING ST.
City or Town: NORTHAMTON State: MA Zip: 01060 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:
No. and Street: 90 CONZ ST. #219
City or Town: NORTHAMTON State: MA Zip: 01060 Country: USA

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

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: EZRA PARZYBOK
No. and Street: 90 CONZ ST #219
City or Town: NORTHAMTON State: MA Zip: 01060 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	ILYA TUNITSKIY	0 NORTH KING ST. NORTHAMTON, MA 01060 USA

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

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

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

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

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 5 Day of May, 2021,
ILYA TUNITSKIY

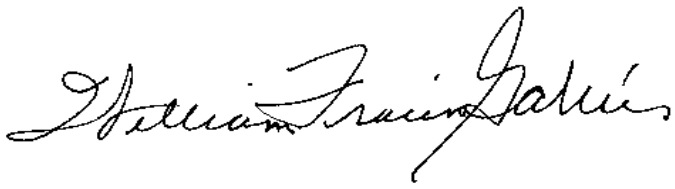
(The certificate must be signed by the person forming the LLC.)

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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:

May 05, 2021 11:48 AM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

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

mass.gov/dor

Letter ID: L1012361408
Notice Date: August 2, 2021
Case ID: 0-001-248-863

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

GAN OR LLC
71 PILGRIM RD
WEST HARTFORD CT 06117-2244

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau

Gan OR LLC

60 Damon Rd.

Northampton, MA 01060

To: Cannabis Control Commission,

This letter serves as an attestation that Gan OR LLC is unable to obtain a certificate of good standing from the department of Unemployment Assistance as the company is unable to register with the department of Unemployment Assistance until hiring employees, after final License.

Ilya Tunitsky 06/28/21

Ilya Tunitsky Date

BUSINESS PLAN – Gan Or Llc

Marijuana Manufacturing/Cultivation Facility

*Vertical operation

*Vertical Operation will commence in Phase II expansion with a delivery center and also research

Disclaimer

Gan Or Llc , Northampton MA: Plan to Remain Compliant with Local Zoning

Gan Or LLc, attests that it will, through its operation of a cultivation and manufacturing establishment in the town of Northamton, MA, follow and remain compliant with all local zoning requirements. Gan Or LLc is adding less then 2000 square foot building to existing 1200sq ft building and therefore is allowed by right without a special permit in the industrial zone of Northamton, MA where it is located. However, a site plan and building permits are required for review by the building commissioner and a conservation review for the entirety of the property expansion of 11.5acres. Gan Or Llc will also follow the use regulations for security and fire, special provisions for parking, loading, signs, etc. A waste water and storm water plan has been also implemented by an engineer as required by DPW with Northamton.

We will also communicate with the town on a regular basis to remain updated and compliant as a respectful business partner.

This Business Plan summarizes certain information about a **Gan Or Llc, .** a Massachusetts company incorporated for the purposes of operating a marijuana cultivation and manufacturing facility. Except where the context requires otherwise, “Gan Or ”, “Company”, “we”, “us”, and “our” refer to **Gan Or Llc,**

Disclaimer

This Business Plan is confidential and proprietary. It is being furnished by Gan Or Llc to prospective investors for the sole purpose of evaluation of the transaction. Without the prior written permission of the Company, such potential investors will not release this document or discuss the information contained herein or make a reproduction of or use this Business Plan for any other purpose. Prospective investors should not assume that this Business Plan is complete and should conduct their own analysis and investigation of the Company and consult with their personal financial, legal, tax and other business advisers before investing in the Company. Prospective investors agree that they are responsible for conducting their own due diligence investigation to verify to their satisfaction any information, opinions or estimates in this document.

Prospective investors in the Company and any other persons who receive this Business Plan agree that they will hold its contents and all related documents in confidence and that they will not utilize such information to the detriment of the Company. Distribution or reproduction of this Business Plan or related materials, in whole or in part, is prohibited.

The Company makes no representations or warranties as to the accuracy or completeness of the information presented herein. Nothing contained herein is or should be relied on as a promise or representation as to the future performance of the Company.

Forward-looking statements

Certain statements in this Business Plan constitute forward-looking statements, which may be identified by words such as “will,” “expect,” “plan,” “intend,” “anticipate,” and other words indicating that the statements are forward-looking. Such forward-looking statements are expectations only and are subject to known and unknown risks, uncertainties and other important factors that could cause the actual results, performance or achievements of the Company, or industry results, to differ materially from any future results, performance or achievement implied by such forward-looking statements. All of the financial information in this Business Plan is unaudited.

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1. Executive Summary

Overview: Gan Or Llc is a Massachusetts-registered Corporation, established to achieve the legalized cultivation and manufacture of high-quality marijuana plants and products. The facility will comprise a propagation room; one vegetative room, extraction building, manufacturing, packaging, administration, and secure storage rooms. The production output will comprise a range of marijuana flower, extracts, edibles, and topical products for sale to licensed retail outlets. Products/Services: Gan Or Llc. will cultivate, process, and - through its product range - offer a variety of high quality, marijuana strains and marijuana products that appeal to both regular, occasional, and new consumers of marijuana using mindful production practices and genetics that provide a balance between the highest yields and the greatest value to customers. The facility, in its proposed configuration, will yield an average of 160 lbs of flower and 22 lbs of trim each month (1760 lbs of bud and 246 lbs of trim per year). It is intended that all production will be sold wholesale to licensed retailers.

Market: With the passing of new legislation, legalized marijuana is the fastest growing U.S. Industry. According to New Frontier Data, the U.S. legal marijuana industry was estimated at $13.6 billion in 2019 US national legal marijuana market value is now assessed at $6.7 billion. The national market is projected to grow from current levels to $24.1 billion by 2025. The opening and legalization of the Massachusetts adult-use marijuana market are sure to see a great many players of all sizes looking to claim their share of the market. The initial "novelty-factor" of legalized marijuana will (if legalization in other states is anything to go by) likely lead to an initial surge in sales leading to shortages of supply, followed by a modest downward trend towards stabilization in both supply and sales on the market as a whole. Gan Or Llc. benefits from being able to offer a range of mature and thoroughly market-tested strains of cannabis.

Competition: The Massachusetts adult-use marijuana industry is still in the emerging stages of market growth. Gan Or llc, will undoubtedly see competition from other cultivators and manufacturers. Medical marijuana growers, confronted by the projected slump of the medical niche in favor of the adult-use market have rapidly made their product available to retailers or have opened adult-use retail stores of their own.

Gan Or llc's, competitive advantage over such players is the maturity of our product range. This, together with our quality-focused approach will help ensure superior quality, lower overheads and a readily scalable production volume. We are confident that this approach will allow us to successfully carve out an appropriate market share and aggressively establish brand recognition.

Risk/Opportunity: The most significant risk associated with our business model is timing. The early movers offering consistent quality and availability will have a distinct advantage and strong position within the local and statewide market. Rapid product launch will lead to the realization of a product offering that not only caters to immediate market needs, but that preemptively embraces the projected demands of the market. Implementing our strategy in a timely manner will put Gan Or Llc. in the best position to succeed.

Management:

Operations: Gan Or Llc. activities will be located at 60 Damon Rd., in Northampton, Massachusetts. Gan Or Llc. will occupy 3,200 sq ft of cultivation building and 1,300sq processing buildings space. Further vertical expansion is incorporated in Phase II of remainder of 11.5acre expansion.

Capital Requirements: The capital requirements for Gan Or Llc. to execute this business plan are approximately

The Company will allocate the invested capital to the following:

Construction and fit-out	$475,000
Equipment- Cultivation and processing	$327,940
Permits, licensing and applications	$38,500
Packaging	$22,850
Working Capital first 6 months (2 Harvests , 1 Tested and Sold)	$110,000

Financial Snapshot:

Consolidated Financials	Year 1	Year 2 (Phase II Delivery)	Year 3 (Phase II Cultivation Expansion)	Year 4 (Phase II Manufacturing Expansion)	Year 5 (Phase II) US Lower Market Value 20% Decrease
Total Sales Revenue	$4,012,000	$8,024,000	$32,096,000	$35,000,000	$28,000,000
Total Expenses (deductible)	$880,161	$1,240,000	$4,960,000	$6,460,000	$6,460,000
Total Expenses (non-deductible)	$300,365	$500,000	$2,000,000	$2,750,000	$2,750,000
Estimated Net Income	**$2,831,474**	**$6,284,000**	**$25,136,000**	**$25,790,000**	**$18,790,000**

Keys to Success:

- Secure Capex and Opex Investment
- Secure all necessary permits for land development
- Secure state licensing
- Construction of cultivation, extraction, manufacturing facility
- Commence cultivation, extraction, and manufacturing processes
- Community Outreach, training, and engagement
- Effective management of funding and working capital
- Successful branding and marketing strategies
- Reinvestment into new technology and continued expansion to maintain competitive edge

2. Project Overview

2.1 Introduction

Gan Or llc will profitably cultivate, manufacture, and sell a range of cannabis flower and THC-infused products applying advanced horticulture production methodologies in a manner that allows for year-round production and superior yields. All of the harvested flower will be dried and cured for sale as pure flower products while the kief and trim will be used as source material for our THC-infused products, or as raw material for THC extraction. Production output will be sold to licensed retail outlets and manufacturers in accordance with the laws of the state of Massachusetts.

The project is budgeted to cost approximately $974,290 including working capital for the first 6 months.

2.2 Company Ownership

Principal ownership of the company is Ilya Tunitskiy

2.3 Company Location and Facilities

The Company's head office, cultivation facility will be created in an existing steel building with a planned steel building addition connecting the two buildings located at 60 Damon Rd in the town of Northampton, Massachusetts. The building is well-located in a correctly-zoned area and offers ample room for future expansion. Ample power is available, and the open nature of the internal structure makes it ideally suited to be rapidly re-adapted for use as an indoor cultivation facility. The entirety of the property Gan Or llc will encompass has a total of 40,000sq ft of building/facility expansion set for Phase II.

Cultivation

Gan Or Llc. will create a **propagation laboratory** that will be fitted and equipped for the transformation and cultivation of seedlings to cuttings and young plants in preparation for their transfer to the grow rooms. This space will house the mother plants, the genetic base, from which our plants will be cultivated.

Three grow rooms will house the systems and equipment for the continued vegetative growth and flowering of our selected marijuana strains and genetics. This process will see the full vegetative growth phase of the individual plants followed by the triggered transformation to the flowering stage. Once

operational, one of two flower rooms will be harvested every 30 days producing a total of 21 harvests per year.

Manufacturing

Our facility will be equipped to extract, blend, fabricate and package a range of THC-infused products. We will include the appropriate equipment for creating Solvent Less Hash Oil (SHO) by extracting cannabis with ice, water, heat, and pressure. Unlike other extraction methods that require solvents such as butane, ethanol, CO2, etc., Gan Or's process will be purely mechanical. This process requires two forms of extraction and develops one of the purest and most sought after cannabis products on the market. The first process consists of using ice and water to extract the cannabinoids from the plant material. After the frozen cannabis material is "washed," the water is poured through various screens to filter the different grades of cannabinoids. Following the screening process, the finished product is placed into a lab grade freeze drier to prepare it for final extraction. Once the freeze dry process is completed, the product is grated to a fine "beach sand" consistency and poured into filter pouches. The pouches are placed onto a pneumatic heated press where evenly distributed heat and pressure separates the oil from the plant's fats, lipids, and other unwanted materials. The purified resin that is extracted from the pouches is collected onto parchment paper and jars for final curing and packaging

Phase II Facilities

A site plan submitted to Town of Northampton for Beginning of September Conservation Commission Review will be completed to amend an existing impervious coverage and storm drain analysis for the commencement of Phase II Facilities. Phase II Expansion allows for vertical integration of proposed indoor facility to bring Gan Or's wholesale product directly to the consumer. This will allow the company to have a better reliable customer acquisition and create a higher more stable value to product for the years to come. In Phase II the following Facilities are proposed.

- Cultivation Expansion to an additional 32,000 sq ft of Canopy Single Tier.
  Both Hybrid Greenhouse sealed facilities and Indoor Facilities.
- 5,000 sq ft of Additional Manufacturing / Research Facility w integrated
  Delivery service serving Massachusetts directly of easily accessible I-91

Administration Center

The administrative and operations center of the facility will be housed in appropriately furnished office space located adjacent to the principal grow and manufacturing facility.

2.4 Technology

The Company has designed and specified each system to comprise cutting-edge technology that creates an end-to-end cultivation system providing optimal efficiency. These systems are based upon extensive real-world marijuana cultivation experience, and their application has been enhanced and developed by our team to ensure consistent results. The systems and equipment required is summarized, but not limited to, the following:

- Grow Lamps
- Air Conditioning System
- Dehumidifiers
- Fans, Barrels, and Pumps
- R/O water system
- Timers and Smart System
- Water Heater
- Backup power Generator

Extraction Equipment

- Cold Water extractor
- Rosin Press

Manufacturing Equipment

- Commercial Mixer
- Packaging Equipment

3. Products

- Topical/Health Products

  -Massage Oil

  -Muscle Rub Cream

- **Smokables**

  -Pure Flower

  -Bubble Hash

  -Dry Sift Kief

  -Rosin

  -And More…

- **Edibles**

  -Gourmet Vegan/Kosher Gummies

  -Strain Beans (Jelly Beans)

  -Chocolate

  -And More…

Product Profiles –

The above list of products consists of the primary, initial product offerings. All products will be packaged and presented in "shelf-ready" condition. Flower will be pre-packaged in eighth and quarter oz packaging that preserves both flavor and quality. That being said, an excess, or glut of flower may be readily sold to processors and manufacturers for transformation, together with the dry sift kief, and the trim, into extracted or THC-infused products. This flexibility underscores Gan Or Llc.'s robust revenue strategy allowing us to remain agile and dynamic as the market evolves.

4. The Market

4.1 Market Overview

Currently, 39 states in America and the District of Columbia have legalized marijuana use in some form (medical or adult-use). The majority of these states have allowed sales for medical use and 21 states, including Massachusetts have legalized cannabis for recreational use. Since an overwhelming majority of the population resides in states that have legalized the use of marijuana for medical use, adult-use, or both, this demonstrates immense potential for the future growth of the industry.

According to New Frontier Data, combined medical and recreational sales are thought to have exceeded beyond $18 billion in 2020, despite the socioeconomic disruptions of the COVID-19 pandemic and are projected to exceed $35 billion over the next 5 years. Further growth is projected with recreational marijuana alone answering for $19 billion annually by the end of 2025, making marijuana the fastest growing industry in the U.S.

4.2 Target Market

On November 8, 2016, Massachusetts voters approved the adult recreational use of marijuana. Following extensive consultations the state has now opened the application review process allowing Licensed Marijuana Establishments to start operations.

With 39 cities, 312 towns and 14 counties, the local municipalities of Massachusetts have been granted the authority to govern their own recreational marijuana industry. This will inevitably result in varying local by-laws on the production, manufacturing, and sale of the plant across the state. Many towns have passed moratoria on the sale and production of marijuana. Others are wary of what the market will bring. Mindful of the unpredictability of regulations and their effect on retail sales during the first wave of implementation, Gan Or Llc. will establish a high-end cultivation facility to supply its retail outlets and manufacturers. Building a brand that represents a culture of sophistication, quality, respect for the plant, and respect for the customer's interaction with cannabis will create a platform from which Gan Or Llc. will rapidly expand to include other products and exploit further sales opportunities.

5. Competition

5.1 Competitive Landscape

Companies in the marijuana industry typically compete on product type, quality, volume, and reliability. Despite prohibition, the marijuana market enjoys widely recognized norms and expectations. This may appear to make competing on the price a somewhat lower expectation. Nevertheless, the volume of potential cultivators and manufacturers makes price competition a genuine possibility. We will counter this with a robust production strategy that ensures the Cost of Goods Sold is carefully balanced against a potentially variable sales price providing revenue stability and continued profitability.

Gan Or Llc. will produce a variety of high-quality, innovative marijuana products in a quantity and frequency that will allow us to carve an important niche in the wholesale market. The high-volume players may be expected to exert some form of price pressure. However, their growing and production techniques are geared towards a mass-market product that consumers may feel compromises the integrity of the end product. Gan Or Llc. will counter the pressure from high-volume cultivators with the outstanding quality of our products.

5.2 Direct Competition

The direct competition for V will come from similar cultivation and manufacturing operations and micro-businesses that grow, produce and sell similar products with the same (or higher) quality and volume. The exact nature of such competition is difficult to quantify but will become apparent as the state of Massachusetts continues to issue cultivation and manufacturing licenses.

5.3 Competitive Advantages

- Vertically Integrated operation. (Phase II)
- Sufficient volume to become a market force.
- Premium product quality.
- Tried and true cultivation practices.
- Competitive pricing.
- Year-round growth
- Timing of entry into the marketplace

- A strong technical team with proven methods and results over the last 20 years
- Energy efficient processes
- A Facility design that allows for rapid expansion and scaling.

6. Strategy and Execution

6.1 Summary

Gan Or Llc. will be recognized as a marijuana brand that offers a distinctive product that represents excellence, quality, and sophistication, that thoughtfully represents customer needs and shared ideals. Gan Or Llc. will carve an important niche among competitors using cultivation methods that reflect a deeper understanding of the context for adult-use marijuana by providing a superior product. We will navigate the legislative challenges facing advertising through a combination of targeted direct advertising and customer partnerships. Gan Or Llc. will efficiently direct our marketing efforts at the regional and local markets, primarily targeting regional customers while maintaining a watchful eye on the growth potential offered for future expansion.

6.2 Marketing Strategy

Value Proposition – Gan Or Llc. will produce exceptional marijuana flower, extracts, THC-infused topicals, and edibles offering customers the convenience and pleasure of a premium marijuana product. Our high-quality marijuana flower will be created using careful cultivation, drying, and curing methods that demonstrate respect for the needs, and nature of the cannabis plant as well as the end-user. We will offer a range of innovative, popular, market-tested, topical and edible products.

The customer will recognize Gan Or Llc. as a mindfully-produced brand that offers an entirely natural product, free from unnecessary additives, where quality, consistency, and an appreciation of the recreational and healthful benefits of marijuana are held in high esteem.

Product differentiation - Gan Or Llc.'s approach allows us to respect and nurture the fundamental needs of the marijuana plant in a manner that ensures that we maintain and amplify its natural characteristics, preserving the flavor, complexity and healthful benefits for which it is valued and appreciated. Gan Or Llc. products will be distinctively and attractively packaged in a manner that establishes and strengthens our branding objectives.

Price point - While price is rarely the most important factor affecting buying behavior, it should strive to achieve parity with the customer's perceived value of the product. Wholesale pricing will be determined

by economic and marketplace conditions, not least those presented by competitors and their pricing models. Nonetheless, marijuana products enjoy – to some degree – the benefits of commoditized values. That is to say, most retailers and manufacturers have a clear idea of the fair market price for marijuana products as do the majority of consumers. It is important to note that while prices for flower, and to some degree pure extract vary and fluctuate, THC-infused products typically demonstrate greater stability. While low and mid-market products may be offered for lower prices, our target market will seek out or be attracted to a product that offers qualities for which they are prepared to pay a premium price.

Promotion - The Gan Or Llc. Brand and products will be promoted through the following means:

Branding through product appearance and packaging – Gan Or Llc. products will be easily and readily identifiable through their distinctive appearance and attractive packaging. This packaging will enjoy a shared branding across the product range and will carefully reflect the premium quality to which our brand aspires.

Direct marketing to a new customer base – The main thrust of our marketing efforts must aim at building brand awareness and rapport with retailers and consumers. Our route to market through retail outlets enables our marketing and sales efforts to work hand in hand. Initial marketing efforts will center around marketing collateral such as product information leaflets, advertising posters, product displays that support retail sales efforts. We will establish customer partnerships through workshops, presentations, and mutually beneficial training seminars that further strengthen our brand.

State, regional, and locally focused advertising and advertorials – CCC regulations lay out strict guidelines regarding marijuana advertisements through print advertising, online advertising, sponsorship. These present many challenges. These challenges are further exacerbated by the unwillingness of players like Facebook and Google to allow marijuana-related advertisements across their medium. Federal laws currently prohibit the sale of marijuana products across state lines. This, therefore, largely negates the need for brand-building beyond state borders in the short term. As the principal market for our immediate future lies within Massachusetts, this is where the main thrust of the advertising opportunities open to us will be made.

Gan Or Llc. will navigate CCC advertising regulations by a policy of indirect advertising; leveraging our educational and outreach programs to build brand awareness, through advertorials and carefully "sanitized" brand message advertisements aimed exclusively at the Massachusetts market, and direct advertising through our customer database as this grows through promotional activities.

Direct advertising – The easiest way to reach existing and prospective customers is through direct advertising in the form of e-mail, electronic newsletters, social media and the like. Using branded marketing in product packages, on websites, and social media, current and prospective customers who participate in our program of campaigns and events will be asked to share email or social media contact details. This data will allow us to rapidly build our marketing and advertising database and enable us – in a manner that satisfies CCC constraints - to direct advertising and promotions at a target audience that is of legal age, predisposed to marijuana consumption, and is likely to share our values.

Trade shows, conferences, and events – Gan Or Llc. will participate in a small but significant number of these events each year. Selected events will offer relevant state opportunities to promote our brand, strengthen sales, network, provide and monitor legislative and industry information relative to the industry in Massachusetts.

Educational activities – Massachusetts state regulations encourage all licensed marijuana establishments to provide relevant educational opportunities for their local communities. Doing so will help LMEs to qualify for the so-called Leadership Ratings Program.

Gan Or Llc. will create a comprehensive series of courses and lectures that meet this desire from the state legislature. Gan Or Llc. will leverage the legitimate advertising and promotion of these courses to strengthen and enhance our brand and its underlying ethos. Participation in these classes will require online enrollment, providing additional opportunities to gather direct advertising data.

Community informational activities – Gan Or Llc. hopes to engage in lectures, seminars, and presentations as thought leaders and entrepreneurs in support of promotional exercises at marijuana-related events. These activities may include educational and/or informational activities carried out at various venues and locations. Gan Or Lllc will also implement a Social Equity Community Impact plan that will help Social Equity groups into the Marijuana Market and give credible resources and assistance. Will also hold a lottery fundraiser.

Marketing Objectives

1. Persuade buyers that our brand and products fit well with their customer's consumption patterns, lifestyle, and self-image.

2. Engage consumers in our community supportive marketing efforts.

3. Satisfy and exceed supply and customer service expectations of retailers and manufacturers.

Target Market – The breadth and variety of our product range will allow Gan Or Llc. to engage our core market of retail outlets.

Market Channels - Retail sales of marijuana are strictly limited to licensed retail outlets, and medical marijuana dispensaries. The location, presence and licensing status of these establishments will be

publicly available through a single online source. Regulations currently preclude opportunities for online purchases as the transportation of marijuana products is strictly regulated.

6.3 Sales Strategy

Sales Objectives

Our business plan will realize the cultivation of a variety of smokable products and cannabis bi-products with a combined net income potential of around $6.2 M per year (year two).

A comparative study of the marijuana markets in other states suggests that demand will outpace supply by a considerable margin during the first year or two before stabilizing in terms of both price and supply. We believe that the market demand will be sufficient to see rapid and complete sales of all available products.

Strategies for Implementation

Sales will be driven by a combination of customer demand, branding, marketing, advertising, and direct sales. Notwithstanding our potential sales projections, it may prove challenging to establish and maintain a high brand profile while serving the needs of the entire market. We plan to tackle this by offering our products to a limited customer base to help ensure that we strike the best possible balance between choice and availability of product, ensuring that our customer's products of choice are, as far as is possible, always available for delivery.

6.4 Implementation Strategy

Capex/Opex capital

The license application process requires that applicants demonstrate and document that the capital funds required to execute their business plan successfully are available and have been obtained from legitimate sources. The Gan Or Llc. business plan demonstrates a need for $974,290 in capital expenditure for space preparation, fit-out, systems, and equipment, and to meet operational expenditure needs and a strategic reserve during the first six months of operation.

Construction, Fit-out, and Systems Acquisition

To prepare our selected location for the cultivation needs that suit our operational requirements we will adapt and fit out the spaces with all necessary equipment, and install and commission all cultivation and operational management systems. Order and acquisition of this equipment and systems must be done as early in the process as possible to mitigate potential lead-time conflicts.

Operations organization, Policies, and Inspection

The state of Massachusetts imposes substantial demands regarding systems and administration for marijuana establishment operators. State law provides powers to impose fines for violations of these regulations. Accordingly, it is essential we ensure that our systems, policies, and administrative routines are robust, compliant and efficient before any state inspection and the subsequent commencement of operations.

First seed and First Sales

Once the above steps have been taken, propagation of our first batch of marijuana may begin. The cultivation and manufacturing facility will be divided into one propagation room, one vegetative room and two cultivation rooms. Each 'grow' will start life as cuttings that will be propagated for before being moved to the cultivation or grow room. There they will remain until ready for harvest. In the meantime, the propagation room will have again started to produce cuttings which will, when ready, be moved to their cultivation rooms and so on.

Once harvested, the plants will be divided into flower, kief and leaf (trim). The flower will be trimmed, dried, cured and packaged, while the trim and kief will simply be extracted, and incorporated into our range of topical and edible products.

7. Management

The proper management of all aspects of the proposed project is crucial to the success of Gan Or Llc. We will combine together a highly-qualified team that offers the experience and knowledge to achieve our goals in a timely, efficient, and professional fashion.

7.1 Personnel plan

Despite the management staff providing the essential knowledge and experience, Gan Or Llc. will require a number of staff with various skills and abilities. The following positions will be filled to meet full operational requirements. The hiring schedule will be timed to meet our needs and is expected to ramp up to full capacity over the first year.

- Three-Four cultivation assistants – to assist the master growers
- Two production assistants – to trim the finished bud or flower, and manufacture of edibles and topicals.

8. Financials

8.1 Financial Assumptions

Summary financial statements are based upon the following financial assumptions:

General

1. Most (but not all) Costs Of Goods Sold and operational expenses (excluding salaries and wages) reflect a proforma 5% increase annually.

2. Revenues and income reflect a proforma 5% increase annually.

3. Salaries and wages reflect a proforma 3% increase annually.

4. In accordance with Massachusetts State regulations for the marijuana industry, up to 3% of gross revenues for the first three years of operation are payable to the municipality in which the company is located. The exact percentage is determined through a Host Community Agreement between the Licensed Marijuana Establishment in question and the relevant municipality. Our current Community Host Agreement by the town of Northampton has waived this 3% for a minimum of 5 years.

5. In accordance with Federal Tax Code 280(e), many operating expenses are non-deductible. In essence this means that all expenses directly related to the Costs Of Goods Sold may be deducted, while general operational, sales and marketing expenses are not.

6. COGS, revenues and yields have been calculated as an average per month for the sake of simplicity. While reality is clearly different, this approach has allowed us to simply and accurately view a process that is full of variables.

Gan Or, LLC Plan for Obtaining Liability Insurance

Overview

We are in discussions with insurance providers and will engage with the provider who best suits the needs of the company once we receive a Provisional License.

1. Once company receives its Provisional Marijuana Establishment License, we will engage with an insurance provider who is experience in the legal marijuana industry.
    a. Company will obtain and maintain general liability insurance coverage for no less than
    $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually.
    b. The deductible for each policy will be no higher than $5,000 per occurrence.
2. The company will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission upon request.

1. **Environmental Policies and Procedures** -
    a. We endeavor to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. These include, but are not limited to;
        i. In accordance with 935 CMR 500.103(4), we will, at the time of license renewal, provide a report that documents our energy and water usage over the preceding 12-month period.
        ii. The use of natural light where possible. We use natural light where possible and only utilize supplemental lighting when needed. Our lighting system is LED-based and offers substantial energy savings when compared to HID, or High-Intensity DIscharge lights.
        iii. While not initially feasible, we hope to explore the addition of a photo-voltaic array to supplement and offset electrical demand through a renewable energy source.
        iv. We will closely follow the development, viability, and availability of energy technology and will incorporate energy-saving systems into their technical operations once their value has been demonstrated. We are committed to the adoption and application of any technology that may practically and reliably reduce our electric demand.
        v. We will actively pursue engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

    b. We shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid and hazardous waste management under 935 CMR 500.103(2).

    c. We shall adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78(b), to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide energy and water usage reporting to the Commission in a form determined by the Commission.

    d. We will adhere to the following minimum energy efficiency and equipment standards;
        i. The building envelope for our facilities except greenhouses, will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (790 CMR: State Building Code), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-conditioning

Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR; State Building Code.

ii. The Lighting Power Densities (LPD) for cultivation space will not exceed an average of 36 watts per gross square foot of active and growing space unless otherwise determined in guidelines issued by the Commission.

iii. Requirements 935 CMR 500.120(11)(b) and (c) shall not be required if we are generating 100% or more of the onsite load from an onsite clean or renewable resource.

iv. Heating Ventilation and Air Conditioning (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code, IECC Section C.403 ASHRAE Chapter 67 as applied or incorporated by reference in (780 CMR: State Building Code).

v. The Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55 § 78(b), including but not limited to provisions for greenhouses and agricultural buildings.

1.1. Maintenance of Financial Records Plan

Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request. All financial records will be maintained in accordance with generally accepted accounting principles. The company will maintain the following written records that are required and subject to inspection, as well as any additional documentation that it may be directed to record by the Commission:

1.1.1. The company will maintain business financial records, which shall include manual or computerized records of:

1.1.1.1. Assets and liabilities.

1.1.1.2. Monetary transactions.

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

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

1.1.1.5. Inventory records as required by 935 CMR 500.105(8) and as outlined in the General Record Keeping section of our standard operating procedures.

1.2. The company shall fully comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

1.3. Our point of sale systems and software are configured to separate accounting practices for marijuana products from non-marijuana products.

1.4. Our facility is not co-located with a medical dispensary and has no obligation to maintain an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10) and 935 CMR 500.140(6).

1.4.1. General

1.4.1.1. We are prohibited from utilizing software or other methods to manipulate or alter sales data.

1.4.1.2. We will conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data.

1.4.1.3. A record that this monthly analysis has been performed shall be maintained by us and made available to the Commission upon request.

1.4.1.4. Should such analysis determine that software or other methods have been installed or utilized to manipulate or alter sales date, Senior management will immediately disclose this information to the Commission, and cooperate in any investigation, and take such other action directed by the Commission.

1.4.2. Inventory records include:

1.4.2.1. Shipping manifests

1.4.2.2. Delivery and unpacking video recordings

1.4.2.3. Daily sales stock withdrawal and return reports

1.4.2.4. Weekly inventory reports

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1.4.2.5. Product return reports

1.4.3. Salary and wages paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

1.4.4. All financial transactions and accounts will be entered into a proprietary accounting software by a bookkeeper specifically employed for the purpose.

1.4.5. The accounting software used will provide security and backup capabilities in accordance with 935 CMR 500.000 and the company security plan.

1.4.6. Daily sales reports will be generated by the bookkeeper and stored both digitally and as a hard copy in the records cabinet.

1.4.7. The accounts will be reviewed monthly by a licensed CPA.

1.4.8. The point of sale system software will automatically transfer all sales transactions to our accounting system for reconciliation by the bookkeeper.

1.4.9. The duty manager will generate a sales report from the point of sale system at the conclusion of each day. This report should be digitized and a hard copy stored in the records cabinet

1.4.10. Expense records

1.4.10.1. duty managers and senior management may be provided with a company debit card and/or check-signing authorization. A receipt must be obtained and presented to the bookkeeper for all expenses paid through these means

1.4.10.2. Documentation supporting business expenses such as statements and invoices, details of cash payments, receipts and the like must be securely stored in the records cabinet and presented to the bookkeeper for entry into the accounting software.

1.4.11. Contracts and Agreements - Green River Cannabis Company, Inc, will likely enter into a number of contracts and agreements with the host municipality, service providers, financial institutions, property owners etc. Such contracts and agreements include, but are not limited to;

Sales and Purchase agreements
Loan agreements
Rental agreements
Lease agreements
Franchise agreements
Sale and lease back agreements
Trading agreements with suppliers
Insurance policies
Legal documentation
All such documentation must be digitized and a hard copy stored in the records cabinet.

1.4.12. Other documents may include;

Deposits with utility companies
Contracts with telecommunications companies
Business registration documents and certificates
Business licensing documents
Surety bonds
Tax records

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All such documentation must be digitized and a hard copy stored in the records cabinet.

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1. Introduction

1.1. The Employee Handbook

1.1.1. This Employee Handbook ("Handbook"] is designed to summarize certain personnel policies and benefits of High Five. (the "Company"] and to acquaint employees with many of the rules concerning employment with the Company. This Handbook applies to all employees, and compliance with the Company's policies is a condition of employment. This Handbook supersedes all previous employment policies, written and oral, express and implied. The Company reserves the right to modify, rescind, delete, or add to the provisions of this Handbook from time to time at its sole and absolute discretion. This Employee Handbook is not a binding contract between the Company and its employees, nor is it intended to alter the at-will employment relationship between the Company and its employees. The Company reserves the right to interpret the policies in this Handbook and to deviate from them when, in its discretion, it determines it is appropriate.

1.2. Changes in Policy

1.2.1. Since our business is constantly changing, the Company expressly reserves the right to revise, modify, delete, or add to any and all policies, procedures, work rules, or benefits stated in this handbook or in any other document, except for the policy of at-will employment as described below. Nothing in this employee handbook or in any other document, including benefit plan descriptions, creates or is intended to create a promise or representation of continued employment for any employee. Any changes to your at-will employment status, described below, must be in writing and must be signed by the Company.

1.2.2. With respect to all other changes to Company policies, we will notify you of these changes in writing. No oral statements or representations can in any way alter the provisions of this Handbook. Changes will be effective on dates determined by High Five. and you may not rely on policies that have been superseded.

1.2.3. If you are uncertain about any policy or procedure, please check with your Supervisor or Human Resources Manager.

1.3. Employment-At-Will

1.3.1. Employment with the Company is on an at-will basis, unless otherwise specified in a written employment agreement. You are free to resign at any time, for any reason, with five days notice. Similarly, the Company is free to conclude the employment relationship at any time for any lawful reason, with or without cause, and with five days notice.

1.3.2. Nothing in this Handbook will limit the right of either party to terminate an at-will employment. No section of this Handbook is meant to be construed, nor should be construed as establishing anything other than an employment-at-will relationship. This Handbook does not limit management's discretion to make personnel decisions such as reassignment, change of wages and benefits, demotion, etc. No person other than the Executive Director, President, or a member of the Board of Directors has the authority to enter into an agreement for employment for any specified period of time or to make an agreement for employment other than at-will terms. Only the Executive Director, President, or member of the Board of Directors of the Company has the authority to make any such agreement, which is only binding if it is in writing and signed by the President of the Company.

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1.4. Marijuana Establishment Agent - Background Checks

1.4.1. The Commonwealth of Massachusetts requires that all board members, directors, employees, executives, managers, or volunteers of a Marijuana Establishment must be 21 years of age or older and in possession of a state-issued Registration Card. Consequently, all those described above are subject to extensive background checks.

1.4.2. Executive officers, managers and employees of a Licensed Marijuana Establishment shall apply for registration for all of its board members, directors, employees, executives, managers, and volunteers who are associated with that Marijuana Establishment.

1.4.3. The Commission shall issue a registration card to each individual determined to be suitable for registration. All such individuals shall:

1.4.3.1. be 21 years of age or older;

1.4.3.2. not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and

1.4.3.3. be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

1.4.4. The Commonwealth of Massachusetts requires, as a condition of employment in a Licensed Marijuana Establishment, the possession of a valid marijuana establishment agent Registration Card. No board member, director, employee, executive, manager, or volunteer may be engaged by a Licensed Marijuana Establishment without possession of a valid Registration Card.

1.4.5. Consequently, denial or revocation of a registration card by the Commission will render any individual unemployable by a Licensed Marijuana Establishment.This may lead to the withdrawal of offers of employment or appointment in the event of a denial of a registration card, and immediate dismissal in the event of revocation of a registration card.

1.4.6. The Company shall notify the Commission no more than one business day after a marijuana establishment agent ceases to be associated with the establishment.The registration shall be immediately void when the agent is no longer associated with the Company..

1.4.7. Registration cards are valid for one year from the date of issue, and may be renewed on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

1.4.8. After obtaining a registration card for a marijuana establishment agent, the Company is responsible for notifying the Commission of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

1.4.9. All marijuana establishment agents shall carry the registration card associated with the appropriate Marijuana Establishment at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

1.4.10. A marijuana establishment agent affiliated with multiple Marijuana Establishments shall be registered as a marijuana establishment agent by each Marijuana Establishment and shall be issued a registration card for each establishment.

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2. Roles, Qualifications, and, Training

2.1. Facility Job Classifications and Requirements:

2.1.1. **Operations Manager** - The operations manager is the face of the facility. The manager must interface with staff, law enforcement, vendors, and customers. The principal responsibility of the operations manager is to coordinate and facilitate the operations of the facility. They must maintain records, have contact with suppliers and the grow site, embrace customer service and understand marketing. They will train employees and decide which products to process and manufacture, and determine best pricing based on market conditions. They are responsible for keeping up with all changes in local and state law regarding operation of the facility. The most important job of the store manager is to ensure the security and integrity of our inventory.

2.1.2. **Wholesale Sales Agent** - The store has a need for retail professionals who can communicate articulately and passionately with customers about a wide range of cannabis products. Desirable backgrounds include previous marijuana vertical experience, sales, pharmacy, education, and customer service. Knowledge of cannabis, the varieties of cannabis, and their effects is highly relevant. They must be keenly aware of the difference of Indica, Sativa and their hybrids. A sales agent will maintain records in accordance with the Operations Manual, serve customers, offering advice and recommendations, be mindful and vigilant in terms of security, and diversion. Sales agents will be trained by the operations manager. This position may be full-, or part-time.

2.1.3. **Production Associate** - Our facility has an ongoing need for production associates to process and manufacture our range of cannabis products. This product range includes, but is not limited to:

Edibles
Extracts
Pre-rolls
Tinctures
Beverages
Vape pens

Production associates will be required to possess or undergo training in the following manufacturing skills:

Extraction
Weighing
Measuring
Filling cones
Freezing
Drying

As with all employees, their duties include ensuring the integrity of the facility's security systems and protecting the facility and its customers from outside criminal disturbance. Desired backgrounds include previous marijuana vertical experience, pharmacy, education, and customer service. Knowledge of cannabis,

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the varieties of cannabis, and their effects is highly relevant. They must be keenly aware of the difference of Indica, Sativa and their hybrids. A production associate will maintain records in accordance with the Operations Manual, fulfill production routines, offering advice and recommendations, be mindful and vigilant in terms of security, and diversion. Production associates will be trained by the operations manager. This position may be full-, or part-time.

2.2. Employee Training and Selection

2.2.1. Our production facility is looking for motivated, friendly, articulate and compassionate people to help create our products and provide our customers and consumers with the finest cannabis products available. We look for people with the above attributes and certain preferred core skills. We are willing to train others in order to ensure workforce diversity. Some of the desirable backgrounds we are looking for include sales, pharmacy, and those with previous experience in the cultivation, processing, and sale of cannabis products through various networks. Previous work experience in a medical or production marijuana facility is highly desirable. We generally train all employees in the following subjects, but tailor each course according to their role within our organization.

2.2.1.1. Cannabis Science
2.2.1.2. Horticultural & Organic Cultivation
2.2.1.3. Methods of Extraction
2.2.1.4. Methods of Ingestion
2.2.1.5. Cooking with Cannabis
2.2.1.6. Medical marijuana use
2.2.1.7. Massachusetts Cannabis Law

2.2.2. Our company is looking for all types of help for our wholesale manufacturing operation, both operational, and administrative. Typical responsibilities include:
2.2.2.1. Production management
2.2.2.2. Wholesale Sales
2.2.2.3. Production and manufacturing
2.2.2.4. Packaging labeling and inventory
2.2.2.5. Sanitation and maintenance of the facility
2.2.2.6. Security of the facility and deliveries
2.2.2.7. Back-office business and management roles such as, account management, administration, etc.

3. Employment Policies

3.1. Employee Classifications

3.1.1. The following terms are used to describe employees and their employment status:
3.1.2. **Exempt Employees** - Employees whose positions meet specific tests established by the Federal Labor Standards Act ("FLSA") and Massachusetts state law. In general, exempt employees are those engaged in executive, managerial, high-level administrative and professional jobs who are paid a fixed salary and perform certain duties. In addition, certain commissioned sales employees and highly paid computer professionals are exempt. Exempt employees are not subject to the minimum wage and overtime laws.

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3.1.3. **Non-exempt Employees** - Employees whose positions do not meet specific tests established by the FLSA and Massachusetts state law. All employees who are covered by the federal or state minimum wage and overtime laws are considered non-exempt. Employees working in non-exempt jobs are entitled to be paid at least the minimum wage per hour and a premium for overtime.

3.1.4. **Regular Employee** - Employees who are hired to work on a regular schedule. Such employees can be either full-time or part-time. The distinction between full-time and part- time depends upon the number of hours that an employee works.

3.1.5. **Full-Time Employee**- Employees who are not temporary employees, independent contractors, or independent consultants and who are regularly scheduled to work a schedule of 40 hours per work week.

3.1.6. **Part-Time Employee** - Employees who are not temporary employees, independent contractors, or independent consultants and who are regularly scheduled to work less than 40 hours per work week.

3.1.7. **Temporary Employees** - Employees who are hired as interim replacements to temporarily supplement the workforce or to assist in the completion of a specific project. Employment assignments in this category are of limited duration and the temporary employee can be let go before the end of the defined period. Short term assignments generally are periods of three (3) months or less, however, such assignments may be extended. All Temporary employees are at-will regardless of the anticipated duration of the assignment [see Employment-at-Will Policy). Temporary employees retain that status unless and until notified in writing of a change.

3.1.8. **Independent Contractor or Consultant** - These individuals are not employees of the Company and are self-employed. An independent contractor or consultant is engaged to perform a task according to his/her own methods and is subject to control and direction only as to the results to be accomplished. Independent contractors or consultants are not entitled to benefits.

3.1.9. Each employee will be advised of his or her status at the time of hire and any change in status. Regardless of the employee's status, the employee is employed at-will and the employment relationship can be terminated by the Company or the employee at any time, with or without cause.

3.2. Equal Employment Opportunity & American with Disabilities Act.

3.2.1. It is the policy of the Company to provide equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, creed, color, national origin, sex, sexual orientation, gender identity, age, ancestry, physical or mental disability, medical condition including medical characteristics, marital status or any other classification protected by applicable local, state or federal laws. This policy prohibits unlawful discrimination based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline and

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termination. Reasonable accommodation is available for qualified individuals with disabilities, upon request.

3.2.2. The Company expects all employees to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination and harassment.

3.2.3. In compliance with the Americans with Disabilities Act (ADA), the Company provides accommodation to the disabled to the full extent required by law. The Company may require medical certification of both the disability and the need for accommodation. Keep in mind that the Company can only seek to accommodate the known physical or mental limitations of an otherwise qualified disabled individual. Therefore, it is your responsibility to come forward if you are in need of an accommodation. The Company will engage in an interactive process with the employee to identify possible accommodations, if any will help the applicant or employee perform the job. We further recognize that employees with life threatening illnesses, including but not limited to cancer, heart disease and AIDS, may wish to continue engaging in as many of their normal pursuits as their condition allows, including work. As long as these employees are able to meet acceptable performance standards with or without reasonable accommodation, and medical evidence indicates that their working does not present a substantial threat to themselves or others, they will be permitted to do so.

3.3. Diversity Plan

It is the policy of this company to foster equal opportunity for all employees and to promote principles of diversity management that will enhance the level of effectiveness and efficiency of its business operations. The concept of diversity management is a strategic business objective that seeks to increase organizational capacity in a workplace where the contributions of all employees are recognized and valued. Our company's goal is to build a high-performing, diverse workforce based on mutual acceptance and trust. It is also our company's policy to select the best qualified applicant for the job, regardless of race, national origin, gender, age, disability, religion, sexual orientation, or any other non-merit factor.

3.4. Confidentiality.

3.4.1. In the course of employment with the Company, employees may have access to "Confidential Information" regarding the Company, which may include its business strategy, future plans, financial information, contracts, suppliers, customers, personnel information or other information that the Company considers proprietary and confidential. Maintaining the confidentiality of this information is vital to the Company's competitive position in the industry and, ultimately, to its ability to achieve financial success and stability. Employees must protect this information by safeguarding it when in use, using it only for the business of the Company and disclosing it only when authorized to do so and to those who have a legitimate business need to know about it. This duty of confidentiality applies whether the employee is on or off the Company's premises, and during and even after the end of the employee's employment with the Company. This duty of confidentiality also applies to communications transmitted by the Company's electronic communications. See Internet, Email and Computer Use policy, below.

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3.4.2. As a condition of employment with the Company, all employees must sign a Non-Disclosure Agreement.

3.5. Employment of Relatives

3.5.1. The Company recognizes that the employment of relatives in certain circumstances, such as when they will work in the same department, or supervise or manage the other, or have access to confidential or sensitive information regarding the other, can cause problems related to supervision, safety, security or morale, or create conflicts of interest that materially and substantially disrupt the Company's operations. When the Company determines any of these problems will be present, it will decline to hire an individual to work in the same department as a relative of an existing employee. Relatives subject to this policy include: father, mother, sister, brother, current spouse or domestic partner, child (natural, foster, or adopted), current mother-in- law, current father-in-law, grandparent, or grandchild.

3.5.2. If present employees become relatives during employment, the Company should be notified so that we may determine whether a problem involving supervision, safety, security or morale, or a conflict of interest that would materially and substantially disrupt the Company's operations exists. If the Company determines that such a problem exists, the Company will take appropriate steps to resolve the problem, which may include reassignment of one relative (if feasible) or asking for the resignation of one of the relatives.

3.6. Introductory Period

3.6.1. The first 30 days of employment are considered an introductory period for all newly hired employees. During this time, you will learn your new responsibilities, get acquainted with fellow employees, and determine whether you are happy with the position. Also, during this time, your manager will monitor your performance. Upon completion of the introductory period, your manager will review your performance. If the Company finds your performance satisfactory and decides to continue your employment, you will be advised of any improvements expected. This is also an opportunity for you to make suggestions to improve the Company's efficiency and operations. Completion of the introductory period does not entitle you to remain employed by the Company for any definite period of time, but instead allows both you and the Company to evaluate whether or not you are right for the position. Your status as an at-will employee does not change. The employment relationship may be terminated with or without cause and with or without advance notice, at any time by you or the Company.

3.7. Personnel Records and Employee References

3.7.1. The Company maintains a personnel file and payroll records for each employee as required by law. Personnel files and payroll records are the property of the Company and may not be removed from Company premises without written authorization. Because personnel files and payroll records are confidential, access to the records is restricted. Generally, only those who have a legitimate reason to review information in an employee's file are allowed to do so. Disclosure of personnel information to outside sources will be limited. However,

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the Company will cooperate with requests from authorized law enforcement or local, state, or federal agencies conducting official investigations and as otherwise legally required.

3.7.2. Employees may contact a Human Resources representative to request a time to review their payroll records and/or personnel file. With reasonable advance notice, an employee may review his or her own records in the Company's offices and in the presence of an individual appointed by the Company to maintain the records. No copies of documents in your file may be made, with the exception of documents that you have previously signed, or documents that may be obtained by you subject to state and/or federal law. You may add your comments to any disputed item in the file.

3.7.3. By policy, the Company will provide only the former or present employee's dates of employment and position(s) held with the Company and eligibility for rehire, if asked. Compensation information may also be verified if written authorization is provided by the employee.

3.8. Privacy

3.8.1. The Company is respectful of employee privacy. All employee demographic and personal information will be shared only as required in the normal course of business. If a healthcare plan becomes available in the future, healthcare enrollment information will be kept in a separate folder from other human resources forms. Workers' Compensation information is not considered private healthcare information; however, this information will be released only on a need-to-know basis.

3.8.2. The Company does not make or receive any private healthcare information through the course of normal work. If any employee voluntarily shares private healthcare information with a member of management, this information will be kept confidential. If applicable, the Company will set up guidelines for employees and management to follow to ensure that company employees conform to the requirements of the Health Insurance Portability and Accountability Act (HIPAA).

3.9. Immigration Law Compliance

3.9.1. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form 1-9 on day of hire and present documentation establishing identity and employment eligibility within three business days of date of hire. Former employees who are rehired must also complete an 1-9 form if they have not completed an 1-9 form with the Company within the past three years, or if their previous 1-9 form is no longer retained or valid. You may raise questions or complaints about immigration law compliance without fear of reprisal.

3.10. Religious Accommodation

3.10.1. The Company will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on the Company's operations. If you desire a religious accommodation, you are required to make the request in writing to your manager as far in advance as possible. You are expected to strive to find co-workers who

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can assist in the accommodation (e.g., trade shifts) and cooperate with the Company in seeking and evaluating alternatives.

3.11. Political Neutrality

3.11.1. Maintenance of individual freedom and our political institutions necessitates broad scale participation by citizens concerning the selection, nomination and election of our public office holders. The Company will not discriminate against any employee because of identification with and support of any lawful political activity. Company employees are entitled to their own personal political position. The Company will not discriminate against employees based on their lawful political activity engaged in outside of work. If you are engaging in political activity, however, you should always make it clear that your actions and opinions are your own and not necessarily those of the Company, and that you are not representing the Company.

4. Hours of Work and Payroll Practices

4.1. Pay Periods and Paydays

4.1.1. Employees are paid on a weekly basis. All employees will be paid on Friday of each week. All employees are paid by check on the above-mentioned payday. If the regular payday falls on a weekend or Company holiday, employees will be paid on the last business day before the holiday and/or weekend.

4.2. Overtime

4.2.1. non-exempt employees will be paid in accordance with Federal and Massachusetts state law. All overtime work by non-exempt employees must be authorized in advance by their manager. Only hours actually worked will be used to calculate overtime pay.

4.3. Rest and Meal Periods

4.3.1. All rest and meal periods will be in accordance with Massachusetts state law. To the extent Massachusetts state law does not require rest and meal breaks, non-exempt employees will be provided a 10-minute rest break for every four hour period of work. This time is counted and paid as time worked. Non-exempt employees scheduled to work more than a five hour period will be provided a 30-minute unpaid meal period.

4.4. Time Cards

4.4.1. Non-exempt employees are required to keep an accurate and complete record of their attendance and hours worked. Time cards are official business records and may not be altered without the employee's supervisor's approval and may not be falsified in any way.

4.5. Payroll Deductions

4.5.1. Various payroll deductions are made each payday to comply with federal and state laws pertaining to taxes and insurance. Deductions will be made for the following: Federal and State Income Tax Withholding, Social Security, Medicare, State Disability Insurance & Family Temporary Disability Insurance, and other items designated by you or required by law (including a valid court order]. You can adjust your federal and state income tax withholding by completing the proper federal or state form and submitting it to Accounting. At the start of each

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calendar year, you will be supplied with your Wage and Tax Statement (W-2] form for the prior year. This statement summarizes your income and deductions for the year.

4.6. Wage Garnishment

4.6.1. A garnishment is a court order requiring an employer to remit part of an employee's wages to a third party to satisfy a just debt. Once the Company receives the legal papers ordering a garnishment, we are required by law to continue making deductions from your check until we have withheld the full amount or until we receive legal papers from the court to stop the garnishment. Even if you have already paid the debt, we still need the legal papers to stop the garnishment.

5. Standards of Conduct and Employee Performance

5.1. Anti-Harassment and Discrimination

5.1.1. The Company is committed to providing a work environment free of sexual or any form of unlawful harassment or discrimination. Harassment or unlawful discrimination against individuals on the basis of race, religion, creed, color, national origin, sex, sexual orientation, gender identity, age, ancestry, physical or mental disability, medical condition including medical characteristics, marital status or any other classification protected by local, state or federal laws is illegal and prohibited by Company policy. Such conduct by or towards any employee, contract worker, customer, vendor or anyone else who does business with the Company will not be tolerated. Any employee or contract worker who violates this policy will be subject to disciplinary action, up to and including termination of his or her employment or engagement. To the extent a customer, vendor or other person with whom the Company does business engages in unlawful harassment or discrimination, the Company will take appropriate corrective action.

5.2. Prohibited Conduct

5.2.1. Prohibited harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if:

5.2.1.1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or engagement.

5.2.1.2. submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's employment or engagement; or it creates a hostile or offensive work environment.

5.2.2. Prohibited harassment includes unwelcome sexual advances, requests for sexual favors and lewd, vulgar or obscene remarks, jokes, posters or cartoons, and any unwelcome touching, pinching or other physical contact. Other forms of unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories.

5.2.3. Prohibited harassment might also be transmitted using the Company's electronic communications system, or through other on-line conduct.

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5.3. Complaint Procedure

5.3.1. Employees or contract workers who feel that they have been harassed or discriminated against, or who witness any harassment or discrimination by an employee, contract worker, customer, vendor or anyone else who does business with the Company, should immediately report such conduct to their supervisor or any other member of management.

5.3.2. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, customer, vendor or other person who does business with this organization is exempt from the prohibitions in this policy. In response to every complaint, the Company will conduct an investigation and, if improper conduct is found, take appropriate corrective action.

5.3.3. To the extent that an employee or contract worker is not satisfied with the Company's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

5.4. Attendance

5.4.1. Punctuality and regular attendance are essential to the successful operation of the Company's business. If an employee is unable to report to work (or to report to work on time) for any reason, the employee must notify his or her supervisor before his or her starting time. If an employee desires to leave work for any reason during the workday, the employee must obtain the approval of his or her supervisor prior to leaving. In the event that the employee fails to call his or her supervisor or report for work for 3 consecutive

5.4.2. workdays, the employee will be deemed to have voluntarily resigned from his or her employment with the Company and will be removed from the payroll. Excessive absenteeism or tardiness may subject the employee to disciplinary action, up to and including termination.

5.5. Discipline and Standards of Conduct

5.5.1. As an at-will employer, the Company may impose discipline whenever it determines it is necessary or appropriate. Discipline may take various forms, including verbal counseling, written warnings, suspension, demotion, transfer, reassignment or termination. The discipline imposed will depend on the circumstances of each case; therefore, discipline will not necessarily be imposed in any particular sequence. Moreover, at any time the Company determines it is appropriate, an employee may be discharged immediately.

5.5.2. Every organization must have certain standards of conduct to guide the behavior of employees. Although there is no possible way to identify every rule of conduct, the following is an illustrative list (not intended to be comprehensive or to limit the Company's right to impose discipline for any other conduct it deems inappropriate]. Keep in mind that these standards of conduct apply to all employees whenever they are on Company property and/or conducting Company business (on or off Company property]. Engaging in any conduct the Company deems inappropriate may result in disciplinary action, up to and including termination. Such conduct may include:

5.5.2.1. Dishonesty;

5.5.2.2. Any agent found to have diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor jay be subject to immediate dismissal.

5.5.2.3. Falsification of Company records;

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5.5.2.4. Unauthorized use or possession of property that belongs to the Company, a coworker, or member of the public;
5.5.2.5. Possession or control of illegal drugs, weapons, explosives, or other dangerous or unauthorized materials;
5.5.2.6. Fighting, engaging in threats of violence or violence, use of vulgar or abusive language, horseplay, practical jokes or other disorderly conduct that may endanger others or damage property;
5.5.2.7. Insubordination, failure to perform assigned duties or failure to comply with the Company's health, safety or other rules;
5.5.2.8. Unauthorized or careless use of the Company's materials, equipment or property;
5.5.2.9. Unauthorized and/or excessive absenteeism or tardiness;
5.5.2.10. Lack of teamwork, poor communication, unsatisfactory performance, unprofessional conduct, or conduct improper for the workplace;
5.5.2.11. Sexual or other illegal harassment or discrimination;
5.5.2.12. Unauthorized use or disclosure of the Company's confidential information;
5.5.2.13. Violation of any Company policy.

5.6. Dress Code

5.6.1. What we wear to work is a reflection of the pride we have in our Company, in what we do, and in ourselves. Although dress code requirements will vary according to job responsibilities, we ask that your appearance at all times show discretion, good taste, and not present a hazard in the performance of your job.
5.6.2. Approval or disapproval of what constitutes appropriate dress is at the discretion of the duty manager.

5.7. Safety

5.7.1. The Company is committed to providing a safe workplace. Accordingly, the Company emphasizes "safety first." It is the employee's responsibility to take steps to promote safety in the workplace and work in a safe manner. By remaining safety conscious, employees can protect themselves and their coworkers.
5.7.2. Employees are expected to promptly report all unsafe working conditions, accidents and injuries, regardless of how minor so that any potential hazards can be corrected.

5.8. Substance and Abuse

5.8.1. The Company is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol, smoking, and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on the Company's premises or while using the Company vehicles or equipment, or
5.8.2. No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event.
5.8.3. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained in accordance with the Laws of the Commonwealth of Massachusetts. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed

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amounts. It also includes any substance a person holds out to another as an illegal drug.

5.8.4. Any violation of this policy will result in disciplinary action, up to and including termination of employment.

5.8.5. Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered. When, in the Company's sole and absolute discretion, the Company determines it is appropriate, an employee may be offered the option of participating in and satisfactorily completing a Company-approved drug and/or alcohol rehabilitation program in lieu of termination.

5.9. Workplace Searches

5.9.1. To protect Company property, prevent diversion, and to ensure the safety of all employees, the Company reserves the right to inspect and search any employee's office, desk, drawers, cabinets, files, locker, equipment, including computers, e-mail and voicemail, Company vehicles, and any area on Company premises. In this regard, it should be noted that all offices, desks, file drawers, cabinets, lockers, and other Company equipment and facilities are the property of the Company, and are intended for business use.

5.9.2. Employees should have no expectation of privacy with respect to items brought onto Company property and/or stored in Company facilities. Inspection may be conducted at any time, without notice, at the discretion of the Company.

5.9.3. In addition, when the Company deems appropriate, employees may be required to submit to searches of their personal vehicles, parcels, purses, handbags, backpacks, briefcases, lunch boxes or any other possessions or articles brought on to the Company's property.

5.9.4. Persons entering the premises who refuse to cooperate in an inspection conducted pursuant to this policy may not be permitted to enter the premises. All employees must cooperate in an inspection; failure to do so is insubordination and will result in disciplinary action, up to and including termination.

5.10. Social Media Policy

5.10.1. High Five. is committed to utilizing social media to enhance its profile and reputation, to listen and respond to customer opinions and feedback, and to drive revenue, loyalty and advocacy. We encourage employees to support our activities through their personal social networking channels while adhering to the guidelines outlined in this section.

5.10.2. For the purpose of this section, social media and networking refers to the use of web-based and mobile applications for social interaction and the exchange of user generated content. Social media channels can include, but are not limited to: Facebook, Twitter, LinkedIn, YouTube, blogs, review sites, forums, online communities and any similar online platforms.

5.10.3. Employees are expected to conduct themselves in a professional manner, to respect the views and opinions of others, and to demonstrate respect for the company, its ownership, clients, guests, vendors, employees and competitors.

5.10.4. The Company and its employees are committed to conducting ourselves in accordance with best industry practices in social networking, to being responsible citizens and community members, to listening and responding to feedback, and

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to communicating in a courteous and professional manner. Behavior and content that may be deemed disrespectful, dishonest, offensive, harassing or damaging to the company's interests or reputation are not permitted.

5.10.5. The use of social media channels on company time for personal purposes is not allowed.

5.10.6. Any social media contacts, including "followers" or "friends," that are acquired through accounts (including but not limited to email addresses, blogs, Twitter, Facebook, YouTube, LinkedIn, or other social media networks) created on behalf of the Company will be the property of the Company.

5.10.7. Employees must not disclose private or confidential information about the Company, its employees, clients, suppliers or customers on social networks. Employees must respect trademarks, copyrights, intellectual property and proprietary information. No third-party content should be published without prior permission from the owner.

5.10.8. The Company maintains the right to monitor company-related employee activity in social networks. Violation of policy guidelines is grounds for discipline, up to and including termination.

5.11. Cell Phone Policy

5.11.1. The use of personal cell phones at work is discouraged because it can interfere with work and be disruptive to others. Therefore, employees who bring personal cell phones to work are required to keep the ringer shut off or placed on vibrate mode when they are in the facility, and to keep cell phone use confined to breaks and meal periods. Conversations should be had away from areas where other employees are working. When cell phone use interferes with the satisfactory performance of an employee's duties or disturbs others, the privilege of using a personal cell phone at work may be taken away and other disciplinary action, up to and including termination, may be imposed.

5.11.2. The Company may provide cell phone allowances to employees in certain positions in an effort to improve efficiency and effectiveness. When cell phones are used for Company business, employees must comply with all Company policies governing conduct, including our policies prohibiting discrimination, harassment, and violence in the workplace. When using the cell phone in a public place, please remember to maintain the confidentiality of any private or confidential business information. As a courtesy to others, please shut cell phones off or place on vibrate mode during meetings.

6. Employee Benefits and Services

6.1. General

6.1.1. Aside from those benefits required by state and federal regulations, High Five. also offers additional benefits for its full-time employees.

6.1.2. From time to time, benefits may be added or deleted from the benefits package.

6.1.3. The Company reserves the right to make such changes.This Handbook does not contain the complete terms and/or conditions of any of the Company's current benefit plans. It is intended only to provide general explanations.

6.1.4. For information regarding employee benefits and services, employees should contact Human Resources.

6.2. COBRA

6.2.1. Under the provisions of the Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1986, if you are covered under the Company's group health

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insurance plan(s) you are entitled to continue your coverage in the event that your employment with the Company ends. Under COBRA, the Company must offer each qualified beneficiary (the employee and any covered dependents) who would otherwise lose coverage under the plan as a result of a qualifying event an opportunity to continue their insurance coverage. A qualifying event is defined as termination of employment, a reduction in the number of hours of employment, death of covered employee, divorce or legal separation, a dependent child ceases to be dependent, eligibility of the covered employee for Medicare, or an employer's bankruptcy.

6.3. Worker's Compensation

6.3.1. All states have Workers' Compensation laws whose purpose is to promote the general welfare of people by providing compensation for accidental injuries or death suffered in the course of employment. These laws are designed to provide protection to workers suffering occupational disabilities through accidents arising out of, and in the course of employment.

6.3.2. High Five. carries Workers' Compensation Insurance for all employees and pays the entire cost of the insurance program.

6.3.3. An employee who suffers an injury or illness in connection with the job is usually eligible to receive payment through the insurance company for lost wages.

6.3.4. In addition to disability payments, necessary hospital, medical and surgical expenses are covered under Workers' Compensation, with payments being made directly to the hospital or physician.

6.3.5. Workers' Compensation benefits to injured workers also includes assistance to help qualified injured employees return to suitable employment.

6.4. Social Security Benefits (FICA)

6.4.1. During your employment, you and the Company both contribute funds to the Federal government to support the Social Security Program. This program is intended to provide you with retirement benefit payments and medical coverage once you reach retirement age.

6.5. Unemployment Insurance

6.5.1. The company pays a state and federal tax to provide employees with unemployment insurance coverage in the event they become unemployed through no fault of their own or due to circumstances described by law. This insurance is administered by applicable state agencies, who determine eligibility for benefits, the amount of benefits (if any), and duration of benefits.

7. Employee Leaves of Absence and Time Off

7.1. General

7.1.1. While regular attendance is crucial to maintain business operations, the Company recognizes that, for a variety of reasons, employees may need time off from work. The Company has available a number of types of leaves of absence. Some are governed by law and others are discretionary. For all planned leaves, however, employees must submit a request at least 14 days in advance; in case of emergencies, employees should submit the request as soon as they become aware of the need for leave. All leaves must have the approval of the Company management. If, during a leave, an employee accepts another job, engages in other employment or consulting outside of the Company, or applies for

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unemployment insurance benefits, the employee may be considered to have voluntarily resigned from employment with the Company.

7.1.2. All requests for a leave of absence will be considered in light of their effect on the Company and its work requirements, as determined by the Company management, which reserves the right to approve or deny such requests in its sole discretion, unless otherwise required by law. For disability-related leave requests, the Company will engage in an interactive process with the employee to determine if a leave is the most appropriate accommodation.

7.1.3. The employee must provide a certification from his or her health care provider to the Company to support a leave for medical reasons. Failure to provide the required certification to the Company in a timely manner will result in delay or denial of leave.

7.1.4. If an employee requires an extension of leave, the employee must request such extension and have it approved before the expiration of the currently approved leave.

7.1.5. While the Company will make a reasonable effort to return the employee to his or her former position or a comparable position following an approved leave of absence, there is no guarantee that the employee will be reinstated to his or her position, or any position, except as required by law.

7.2. Sick Days

7.2.1. Eligible employees are entitled to paid sick days in accordance with Massachusetts law.

7.3. Pregnancy-Disability Leave

7.3.1. Employees who are disabled on account of pregnancy, childbirth, or a related medical condition may request an unpaid leave of absence. Such leave will be granted for the period of disability, up to a maximum of four months. Time off may be requested for prenatal care, severe morning sickness, doctor-ordered bed rest, childbirth, and recovery from childbirth.

7.3.2. Leave provided for pregnancy disability is treated separately from leaves required by the state family and medical leave law. However, the first 12 workweeks of a pregnancy disability leave will be treated concurrently as a leave pursuant to the federal Family and Medical Leave Act ("FMLA") for all eligible employees.

7.3.3. Employees who wish to take a pregnancy disability leave must notify Human Resources of the date the leave is expected to commence and the estimated duration of the leave. Notice should be given as indicated above. The employee must also provide a medical certification of disability to the Company. Failure to provide the required medical certification to the Company in a timely manner will result in delay or denial of leave. Before returning to work, the employee must provide a medical certification that she is able to resume her original job duties. Appropriate forms may be obtained from Human Resources.

7.3.4. Employees who return to work immediately following the expiration of an approved pregnancy disability leave will generally be reemployed in their former position or a comparable job, as required by law.

7.3.5. Employees who are affected by pregnancy may also be eligible to transfer to a less strenuous or hazardous position or duties, provided certain prerequisites are met. Reasonable accommodations may be requested with the advice of the employee's health care provider. In addition, lactation accommodation is also available, upon request. For more information on pregnancy disability leave or transfer and its effect on the terms, conditions or benefits of employment, please contact Human Resources.

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7.4. Workers' Compensation Leave

7.4.1. Any employee who is unable to work due to a work related injury or illness and who is eligible for Workers' Compensation benefits will be provided an unpaid leave for the period required. The first 12 weeks will be treated concurrently as a family and medical leave under the federal Family Medical Leave Act ("FMLA"} for eligible employees.

7.5. Voting Time

7.5.1. Employees who are registered voters and who lack sufficient time outside of work to vote in any local, state, and national election may take up to two hours off work with pay at the beginning or end of the day for this purpose. Employees should provide at least two working days' notice when time off is required.

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IMPORTANT NOTE

The cultivation of cannabis products is our reason for existence. We have been licensed by the state and local authorities to provide and sell inspected, quality cannabis products for adult use, and, where appropriate, to educate our clientele on any questions they might have about the safe use of these products.

Inevitably, many customers will seek out cannabis for its perceived medical benefits. **We are not doctors, and consequently, cannot give medical advice**. We can offer guidance and share anecdotal stories of what customers have experienced from some of the different strains and delivery methods (tincture, edibles, etc…) that we offer, but **we cannot give assurances that any cannabis product will work to alleviate any particular ailment or symptom**.

As a licensed cultivation establishment we are mandated to follow the state's requirements for tracking sales. Our license only permits wholesale sales to licensed marijuana retail establishments. The state requires that we track and record all sales transactions including customer details. This is also an essential element of our company policy of rigorous compliance with all state and local legislation and by-laws, and a key component of our strategy to combat diversion. All customers must have their details, including their verified state retail marijuana license entered into the database prior to any sale or transfer. These details, together with a record of their purchases, will be recorded and maintained for the benefit of state inspectors.

NO customer may enter our production premises without first presenting a valid, recognized, photo ID to the Duty Manager. Valid ID must be shown before entering the facility and at the Point of Sale for data-entry purposes.

There are NO EXCEPTIONS, and NO EXCUSES to this rule.

1. **Restricting Access to age 21 and older**
   - 1.1. All employees and registered agents must be 21 years of age or older.
   - 1.2. All visitors must be 21 years of age or older.
   - 1.3. In accordance with 935 CMR 500.110 (1) (a) and 935 CMR 500.105 (14), **NO** person may enter our premises without first producing a valid, state or federal, photo ID.
   - 1.4. Valid ID must be presented to the Duty Manager prior to entering the facility, and at the Point of Sale for data-entry purposes.
   - 1.5. No person under 21 years of age may enter the premises. There are **NO** exceptions to this rule.
   - 1.6. Loitering, in accordance with 935 CMR 500.110 (1) (b) is not permitted under any circumstances. Any person suspected of loitering should be politely questioned by a member of staff and, if unable to credibly account for their presence, be asked to leave the vicinity. Should the person refuse, the matter should be elevated to the Operations Manager who may, if necessary, contact local law enforcement for assistance in removing the person from the facility.
   - 1.7. All cannabis waste will be rendered unusable and safely disposed of as outlined in **Cannabis Waste Disposal Procedures**, above.
   - 1.8. All access to cannabis product will be strictly controlled and monitored as outlined in **Prevention of Diversion**, above.

1. Roles, Qualifications, and, Training

1.1. General

1.1.1. All employees shall receive training on job specific duties prior to performing those job functions.

1.1.2. All employees shall receive a minimum of eight (8) hours of ongoing training annually.

1.1.3. All current owners, managers, and employees shall complete the Responsible Vendor Program after July 1, 2019 or when available.

1.1.4. All new employees shall complete the Responsible Vendor Program within 90 days of being hired.

1.1.5. Responsible Vendor Program documentation must be retained for four (4) years.

1.2. Facility Job Classifications and Requirements:

1.2.1. **Operations Manager** - The operations manager is the face of the facility. The manager must interface with staff, law enforcement, inspectors, vendors, and customers. The principal responsibility of the operations manager is to coordinate and facilitate the operations of the facility. They must maintain records, have contact with suppliers and the grow site, embrace customer service and understand marketing. They will train employees and decide which products to cultivate, process and manufacture, and determine best pricing based on market conditions. They are responsible for keeping up with all changes in local and state law regarding operation of the facility. The most important job of the store manager is to ensure the security and integrity of our inventory.

1.2.2. **Duty Manager** - The Duty manager deputizes for the Operations Manager in their absence. The Duty manager must interface with staff, law enforcement, inspectors, vendors, and customers. They must maintain records, have contact with suppliers and the grow site, embrace customer service and understand marketing. They will train and supervise employees. They are responsible for keeping up with all changes in local and state law regarding operation of the facility. The most important job of the store manager is to ensure the security and integrity of our inventory.

1.2.3. **Wholesale Sales Agent** - The store has a need for retail professionals who can communicate articulately and passionately with customers about a wide range of cannabis products. Desirable backgrounds include previous marijuana vertical experience, sales, pharmacy, education, and customer service. Knowledge of cannabis, the varieties of cannabis, and their effects is highly relevant. They must be keenly aware of the difference of Indica, Sativa and their hybrids. A sales agent will maintain records in accordance with the Operations Manual, serve customers, offering advice and recommendations, be mindful and vigilant in terms of security, and diversion. Sales agents will be trained by the operations manager. This position may be full-, or part-time.

1.2.4. **Cultivation Associate** - Our facility has an ongoing need for cultivation associates to cultivate, process and manufacture our range of cannabis plants and derivatives.

Cultivation associates will be required to possess or undergo training in the following cultivation and processing skills:

Plant care and management

Extraction
Weighing
Measuring
Freezing
Drying

As with all employees, their duties include ensuring the integrity of the facility's security systems and protecting the facility and its customers from outside criminal disturbance. Desired backgrounds include previous marijuana vertical experience, pharmacy, education, and customer service. Knowledge of cannabis, the varieties of cannabis, and their effects is highly relevant. They must be keenly aware of the difference of Indica, Sativa and their hybrids. A production associate will maintain records in accordance with the Operations Manual, fulfill production routines, offering advice and recommendations, be mindful and vigilant in terms of security, and diversion. Cultivation associates will be trained by the operations manager. This position may be full-, or part-time.

1.3. Employee Training and Selection

1.3.1. Our cultivation facility is looking for motivated, friendly, articulate and compassionate people to help create our products and provide our customers and consumers with the finest cannabis products available. We look for people with the above attributes and certain preferred core skills. We are willing to train others in order to ensure workforce diversity. Some of the desirable backgrounds we are looking for include sales, pharmacy, and those with previous experience in the cultivation, processing, and sale of cannabis products through various networks. Previous work experience in a medical or production marijuana facility is highly desirable. We generally train all employees in the following subjects, but tailor each course according to their role within our organization.

1.3.1.1. Cannabis Science
1.3.1.2. Horticultural & Organic Cultivation
1.3.1.3. Methods of Extraction
1.3.1.4. Methods of Ingestion
1.3.1.5. Cooking with Cannabis
1.3.1.6. Medical marijuana use
1.3.1.7. Massachusetts Cannabis Law

1.3.2. Our company is looking for all types of help for our wholesale manufacturing operation, both operational, and administrative. Typical responsibilities include:
1.3.2.1. Production management
1.3.2.2. Wholesale Sales
1.3.2.3. Production and cultivation
1.3.2.4. Packaging labeling and inventory
1.3.2.5. Sanitation and maintenance of the facility
1.3.2.6. Security of the facility and deliveries
1.3.2.7. Back-office business and management roles such as, account management, administration, etc.

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1.1. Quality Control and Testing

1.1.1. Incoming marijuana inventory

1.1.1.1. In accordance with 935 CMR 500.160 (9), no marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an independent, state-licensed, testing laboratory and deemed to comply with the standards required under 935 CMR 500.160

1.1.1.2. We must ensure that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:

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

1.1.1.3. All of the raw cannabis materials used in our products are tested by our cultivation suppliers. The initial quality control and testing of these raw cannabis materials is the responsibility of these suppliers. That being said, there are certain steps that we can take to ensure that the products entering our inventory are tested, have achieved the correct quality, and are stored and rotated in a manner that best ensures their continued quality throughout their shelf-life.

- All products must be thoroughly checked upon arrival at our facility in accordance with **Transportation of Marijuana** and **Inventory Control and Reconciliation** protocols above.
- Should the accompanying test report indicate contaminant levels in excess of those accepted by DPH protocols identified in 935 CMR 500. 160 (1), the Operations Manager will immediately notify senior management who will notify the commission within 72 hours.
- Together, the Operations Manager, the testing laboratory, and the original producer will determine whether the product is suitable for remediation or whether the entire batch must be destroyed in accordance with 935 CMR 500.105 (12).
- Each of the three parties should submit a report on the incident to the Commission.
- The Operations Manager should check each item and identify any that are outdated, damaged, mislabeled, contaminated or compromised. Any such products should be set aside for disposal.
- Once the products enter our inventory it is the Operations Manager's responsibility to ensure that:

1.1.1.3.○.1. Stock is efficiently rotated to ensure that older product is used before newer product.

1.1.1.3.○.2. All stock is appropriately stored to prevent spoiling and damage to the product.

1.1.2. Outgoing marijuana inventory

1.1.2.1. In accordance with 935 CMR 500.160 (9), no marijuana product shall be sold or otherwise marketed for adult use that has not first been tested by an independent, state-licensed, testing laboratory and deemed to comply with the standards required under 935 CMR 500.160

1.1.2.2. All of our products are sold pre-packaged and tested by a state-licensed, marijuana test laboratory. The final quality control and testing of our products is the responsibility of both the test laboratory and CCE CAT, LLC. There are certain steps that we must take to ensure that the products leaving our inventory for delivery to licensed retail establishments are tested, have achieved the correct quality, and are stored and rotated in a manner the best ensures their continued quality throughout their shelf-life.

1.1.2.3. All products must be thoroughly checked prior to shipment from our facility in accordance with **Transportation of marijuana** and **Inventory Control and Reconciliation** protocols above.

1.1.2.4. No production batch may be cleared for shipment before a sample has been submitted to the testing lab for analysis and the relevant test report has been received by us and entered into the database.

1.1.2.5. Should the test report indicate contaminant levels in excess of those accepted by DPH protocols identified in 935 CMR 500. 160 (1), the Operations Manager will immediately notify senior management who will notify the commission within 72 hours.

1.1.2.6. Together, the Operations Manager, the testing laboratory, and the original cultivator will determine whether the product is suitable for remediation or whether the entire production batch must be destroyed in accordance with 935 CMR 500.105 (12).

1.1.2.7. Each of the three parties should submit a report on the incident to the Commission.

1.1.2.8. The Operations Manager should check each item and identify any that are outdated, damaged, mislabeled, contaminated or compromised. Any such products should be set aside for disposal.

1.1.2.9. Whilst our products remain in our inventory it is the Operations Manager's responsibility to ensure that:

- Stock is efficiently rotated to ensure that older product is sold before newer product.
- All stock is appropriately stored to prevent spoiling and damage to the product.

1.1.3. Hygiene

1.1.3.1. All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified.

1.1.3.2. Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

- Maintaining adequate personal cleanliness; and

- Washing hands appropriately.

1.1.3.3. Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands.

1.1.3.4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

1.1.3.5. 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.

1.1.3.6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair.

1.1.3.7. All contact surfaces shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination.

1.1.3.8. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana.

1.1.3.9. Water supply shall be sufficient for necessary operations.

1.1.3.10. Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment.

1.1.3.11. The establishment shall provide its employees with adequate, readily accessible toilet facilities.

1.1.3.12. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

Diversity Plan

Introduction
To the extent permissible by law it is the policy of this company to promote equity among the following demographic groups:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People who identify as LGBTQ+

The execution of this plan will be documented and reviewed annually. The outcome of this review will be provided by our company to the Commission prior to the annual renewal of our license.

Any action taken, or programs instituted, by our company for the execution of this plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

This plan will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

Goals
Our company has established the diversity goals of;

1. Employing 55% or more women; 30% minorities; 20% LGBTQ+; 10% veterans, and; 10% those with disabilities.
2. Accessing a list from the Supplier Diversity Office to engage with wholesale partners, vendors, and contractors who are minority-owned, women-owned, LQGTQ+ owned, or veteran-owned. We have a goal of working with 10% of wholesale partners who are minority or women owned (due to the paucity of non-white, heterosexual male Marijuana Establishment owners), and 25% contractors and vendors who are diverse.
3. We have a goal of 90% of staff taking job satisfaction surveys annually, or upon exit, with a 75% or greater satisfaction in regards to inclusivity, and 100% of staff having access to diversity literature.
4. An employee promotion goal wherein at least 50% of the employees who receive promotions within our first year of operations are diverse.

Programs

The following programs will help effectuate the above goals:

1. Employment opportunities- when available- will be published no less frequently than annually- Indeed.com, and Masslive.com with the objective of reaching residents from closest ADIs (Greenfield, Holyoke, Springfield ADIs), women, and minorities as well as LGBTQ+ and or those with disabilities.
2. Distribute internal workplace information notices, annually (and ongoing), aimed at encouraging current employees to recommend residents from an ADI, women, veterans, and minorities as well as LGBTQ+ and or those with disabilities for employment;
3. Develop and provide satisfaction/exit surveys annually for employees and when employees leave.
4. We will have an anonymous comment box in the breakroom and our Diversity goals will be posted clearly so that staff can work together to achieve them and help seek out diverse employees, vendors or contractors to engage with.
5. Participate in job and recruitment fairs- no less than annually when employees are needed- that specifically target residents from an ADI, women, and minorities as well as veterans, LGBTQ+ and or those with disabilities
6. Access the SDO supplier list to engage with minority suppliers

Measurement

We intend to focus our efforts on the following metrics:

1. Have 3 employment positions been created since initial licensure?
2. Have we advertised available positions in Indeed.com with the objective of more effectively reaching residents from an ADI, women, and minorities as well as LGBTQ+ and veterans, or those with disabilities?
3. Have we relayed our hiring needs to the Social Equity cohort?
4. Have we posted at least one job and recruitment posting on Indeed.com that specifically targets diverse residents, women, minorities, LGBTQ+ and or those with disabilities?
5. Have women been hired in at least 55% of the available positions?
6. Have those with disabilities and those who identify as LGBTQ+ been hired for at least 20% of available positions?
7. Have employees advanced their job roles since hiring, trained with more advanced personnel, or brought on diverse employees in their network which has increased company or management Diversity with 50% of promotions being diverse employees?
8. Have exit surveys and anonymous satisfaction surveys been made available to all employees after 6 months of employment and do they reflect a pro-diversity company?
9. Have we partnered with at least 2 minority, women, LGBTQ+, or veteran-owned businesses or wholesalers?

10. Do we have evidence of the literature or postings on Diversity we have made available to employees and an anonymous comment box to facilitate diverse voices in our staff?
11. Are staff aware, through staff meeting agendas, emails, paper bulletins, or other methods that Diversity is a compliance issue and important to the company and community?

Record keeping procedures

1.1. Pursuant to 935 CMR 500.000, company records will be available for inspection by the Commission, upon request. We will maintain the following written records that are required and subject to inspection, as well as any additional documentation that it may be directed to record by the Commission:

1.1.1. Written Operating Procedures as required by 935 CMR 500.105 (1) The Operations Manager has copies of the company operating procedures.

1.1.1.1. It is the responsibility of all employees to carefully read, understand and follow these operating procedures.

1.1.1.2. All employees are responsible for ensuring that these operating procedures are followed.

1.1.1.3. Any deviation from standard operating procedures must be authorized by the Operations Manager or your immediate supervisor.

1.1.1.4. These operating procedures will be revised from time-to-time and minor adjustments will likely be made. All revisions will be carefully noted and the operating procedures manual updated.

1.1.1.5. Any material changes will be communicated to the Commission

1.1.1.6. Inventory records as required by 935 CMR 500.105(8);

1.1.2. Inventory records include:

Shipping and delivery manifests Delivery
and shipping video recordings
Daily production stock withdrawal and return reports
Weekly inventory reports
Product return reports

1.1.2.1. Shipping manifests - All deliveries and shipments will be accompanied by a shipping manifest. Once this document has been used to verify the delivery or shipment it must be scanned for digital storage and the original placed in the appropriate ringbinder and stored in the records cabinet.

1.1.2.2. Delivery and shipment packing and unpacking video recordings - All deliveries and shipments will be recorded using a video recording device. These recordings will be transferred to digital storage medium, clearly labelled with the date and manifest number(s) and stored in the records cabinet. Any and all variances from the manifest must be reported in accordance with standard operating procedures.

1.1.2.3. Daily production stock withdrawal and return reports - Each day, items will be removed from the main storage vault and placed in the production area for use. These items will be carefully recorded at the time of withdrawal. Unused production stock will be recorded on the same sheet when returned to the storage vault at the end of daily operations.

1.1.2.3.1. If, during the course of the day, additional items must be withdrawn from the storage vault, they too will be added to the withdrawal report and accounted for upon the return of production stock to the storage vault.

1.1.2.3.2. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.

1.1.2.4. Weekly inventory reports - Each week, the Operations Manager, together with another licensed employee will conduct an inventory of all goods in the storage vault. Any and all variances must be reported in accordance with standard operating procedures. All inventory records are to be digitized and a hard copy kept in the records cabinet.

1.1.2.5. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e). The company uses a proprietary Seed-to-sale tracking software that allows cultivators, manufacturers, retailers, the Commission and others to quickly and easily track marijuana and marijuana products from propagation to sale.

1.1.2.6. Our manufacturing establishment receives raw marijuana, and marijuana products in a variety of forms for use in our range of products .

1.1.2.7. Once goods are delivered and manifests verified, all marijuana products must be entered into the Seed-to-sale tracking software in order to maintain an unbroken chain of custody.

1.1.2.8. All goods pertaining to a specific manifest will be entered into the system as a batch. Where applicable, a report pertaining to these items will be generated on the seed-to-sale software, printed out, and securely attached to the manifest.

1.1.3. Personnel records:

1.1.3.1. All personnel files are to be stored in the records cabinet

1.1.3.2. The employee handbook contains a job description for each employee and volunteer position in the company. A signed copy of the relevant job description for each employee will also be kept in the individual personnel record of each employee.

1.1.3.3. A personnel record for each marijuana establishment agent shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:

1.1.3.3.1. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);

1.1.3.3.2. documentation of verification of references; the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision

1.1.3.3.3. 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;

1.1.3.3.4. documentation of periodic performance evaluations;

1.1.3.3.5. a record of any disciplinary action taken.

1.1.3.3.6. notice of completed responsible vendor and eight-hour related duty training.

1.1.3.3.7. records of any health and safety related incidents

1.1.4. Personnel policies and procedures

1.1.4.1. All personnel policies and procedures are clearly outlined in the employee handbook, a copy of which is available to all employees.

1.1.4.2. Certain specialized procedures are contained in the security plan.

1.1.4.3. All new employees will be required to read the employee handbook and security plan, undergo basic security training and sign a document acknowledging receipt of each and all of these elements. This acknowledgement will be stored with their individual personnel record.

1.1.4.4. All personnel files are to be stored in the records cabinet

1.1.4.5. All employees will be subject to a state-mandated background check. Background check reports obtained in accordance with 935 CMR 500.030 will be digitized and a hard copy placed into the individual personnel records

1.1.4.6. All records of waste disposal must be maintained pursuant to 935 CMR 500.105(12).

1.1.4.7. In the course of normal operations quantities of marijuana waste may be generated from normal processing operations, packaging errors, or customer returns. All marijuana waste must be disposed of in accordance with 935 CMR 500.105 (12).

1.1.4.8. All cannabis waste must be handled in accordance with the **Cannabis Waste Disposal Procedures** above.

1.1.4.9. The items disposed of and recorded in the inventory reconciliation report must also be entered in the seed-to-sale tracking software to ensure the completion of an unbroken chain of custody.

1.1.4.10. At least two licensed marijuana agents must witness and document this process.

1.1.4.11. Such documentation shall be retained for a minimum of three years or longer if so directed by the Commission.

1.1.5. Security Device Log

1.1.5.1. The issue and return of all security devices such as swipe cards, keys, codes and combinations must be noted in the security device log.

1.1.5.2. Employees acknowledge the receipt or return of such devices by signing this log.

1.1.5.3. Recording the issue and return of all security devices is the responsibility of the Operations Manager or senior management as required in the security plan.

1.1.5.4. The issue of security devices may only be authorized by the Operations Manager or senior management as required in the security plan.

1.1.5.5. The issue of codes and combinations is acknowledged by signing the relevant entry in the security device log. On NO account may the actual code or combination be noted or written down, either in the security device log or elsewhere. See the security plan for additional details.

1.1.6. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

1.2. As per 935 CMR 500.105 (9) we will maintain our records in accordance with generally accepted accounting principles

1.3. Our written operating procedures will be maintained as required by 935 CMR 500.105(1). *935 CMR 500.105(9)*

1.4. The following business records will be maintained;

- Assets and liabilities;
- Monetary transactions;
- Books of accounts;
- Sales records; and
- Salary and wages paid to each employee. *935 CMR 500.105(9)*