Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284228

Original Issued Date: 03/21/2022

Issued Date: 03/21/2022

Expiration Date: 03/21/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Hadleaf Holistic Greens Dispensary LLC.

Phone Number: 860-983-0475 **Email Address:** hadleafholistic@gmail.com

Business Address 1: 251 Russell St. **Business Address 2:**

Business City: Hadley **Business State:** MA **Business Zip Code:** 01035

Mailing Address 1: 251 Russell St. **Mailing Address 2:**

Mailing City: Hadley **Mailing State:** MA **Mailing Zip Code:** 01035

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: Executive / Officer **Other Role:**

First Name: Andrew **Last Name:** Wielblad **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY
No records found

CLOSE ASSOCIATES AND MEMBERS
No records found

CAPITAL RESOURCES - INDIVIDUALS
Individual Contributing Capital 1

First Name: Andrew **Last Name:** Wielblad **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $633425 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES
No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES
No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 251 Russell St.

Establishment Address 2:

Establishment City: Hadley **Establishment Zip Code:** 01035

Approximate square footage of the establishment: 2100 **How many abutters does this property have?:** 15

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

HOST COMMUNITY INFORMATION
Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form.pdf	pdf	60db85c0aa87100331f61b46	06/29/2021
Community Outreach Meeting Documentation	Community Outreach Attestation Form.pdf	pdf	60db874484f3fe0296c3f2ee	06/29/2021
Community Outreach Meeting Documentation	Attachment A - Community Outreach Meeting Documentation -Newspaper Ad.pdf	pdf	60db8752308c7a02a1ffc388	06/29/2021
Community Outreach Meeting Documentation	Attachment B - Town Notice of Community Outreach Mtg.pdf	pdf	60db875b8d6c3f02b7d18fed	06/29/2021
Community Outreach Meeting Documentation	Attachment C - Abutters Letter re Notice of Outreach Mtg.pdf	pdf	60db87613678b8028bd4177d	06/29/2021
Community Outreach Meeting Documentation	Community Outreach Amendment D.pdf	pdf	61e05210879c73091c810b7d	01/13/2022
Plan to Remain Compliant	Plan to Remain Compliant with Local Zoning.pdf	pdf	61e05316ea0b000858e83c5c	01/13/2022

with Local Zoning

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact.pdf	pdf	61003705d07ddc0864d06f15	07/27/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

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

First Name: Andrew **Last Name:** Wielblad **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Certificate of Good Standing - Dept of Revenue.pdf	pdf	61003cc6ba4187083b732614	07/27/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing - Sec of Commonwealth of MA.pdf	pdf	61560da0c73bae68fe1121fc	09/30/2021
Articles of Organization	HadleafHolisticsGreensDispensaryLLC.pdf	pdf	617c1e757c9a0537aea47cf0	10/29/2021
Bylaws	LLC Operating Agreement of Hadleaf Holistic Greens Dispensary LLC.pdf	pdf	61e054858dbcc3090663616d	01/13/2022
Department of Revenue - Certificate of Good standing	Signed Affidavit - Dept of Unemployment Assistance Registration - Hadleaf.pdf	pdf	61e054b9d3dbc608cff9fadf	01/13/2022

No documents uploaded

Massachusetts Business Identification Number: 001416864

Doing-Business-As Name: HADLEAF HOLISTIC GREENS DISPENSARY LLC

DBA Registration City: Hadley

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Hadleaf Business Plan.pdf	pdf	617c1f3a3982c731eb1c4446	10/29/2021
Proposed Timeline	Hadleaf Proposed Timeline for Achieving Operation of Establishment.pdf	pdf	61e054ee879c73091c810bb9	01/13/2022
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	61e05500dc96b108e5512adc	01/13/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for obtaining marijuana or marijuana products.pdf	pdf	61562d00c73bae68fe112388	09/30/2021
Separating recreational from medical operations, if applicable	Separating Recreational from Medical Operations.pdf	pdf	61562dc9c73bae68fe11238c	09/30/2021
Restricting Access to age 21 and older	Restricting Access to Age 21 and Older.pdf	pdf	6156308ac73bae68fe11239d	09/30/2021
Prevention of diversion	Prevention of Diversion.pdf	pdf	617c044851c4da37cbfb4a54	10/29/2021
Personnel policies including background checks	Personnel Policies.pdf	pdf	617c0e3f7f037d37d69b7f53	10/29/2021
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	617c0f23d8c16731dcbdd37c	10/29/2021
Record Keeping procedures	Hadleaf Record Keeping Procedures.pdf	pdf	617c11ba6155aa37c425251d	10/29/2021
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	617c16d386cf8531b41a1520	10/29/2021
Security plan	Hadleaf Security Plan - Updated.pdf	pdf	61e05548a828d708f050a41e	01/13/2022
Security plan	Secured Areas Layout - Hadleaf.pdf	pdf	61e0555ad04772090d59cd41	01/13/2022
Storage of marijuana	Product Storage Plan - Updated.pdf	pdf	61e0557435cb3e08f7217a26	01/13/2022
Transportation of marijuana	Transportation Plan - Updated.pdf	pdf	61e0558b879c73091c810bbf	01/13/2022
Inventory procedures	Inventory Procedures-Updated.pdf	pdf	61e055a0ea0b000858e83c88	01/13/2022
Quality control and testing	Quality Control and Testing - Updated.pdf	pdf	61e055b7ea0b000858e83c8c	01/13/2022
Dispensing procedures	Dispensing Procedures - Updated.pdf	pdf	61e055ccd04772090d59cd47	01/13/2022
Qualifications and training	updated Hadleaf Employee Qualifications and Training.pdf	pdf	61e055ee8d09e508d610ea29	01/13/2022
Diversity plan	updated Diversity Plan.pdf	pdf	61e05605dc96b108e5512ae5	01/13/2022

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	**Monday To:** 8:00 PM
Tuesday From: 10:00 AM	**Tuesday To:** 8:00 PM
Wednesday From: 10:00 AM	**Wednesday To:** 8:00 PM
Thursday From: 10:00 AM	**Thursday To:** 8:00 PM
Friday From: 10:00 AM	**Friday To:** 8:00 PM
Saturday From: 10:00 AM	**Saturday To:** 8:00 PM
Sunday From: 10:00 AM	**Sunday To:** 8:00 PM

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

Applicant

I, Andrew Wielblad, (*insert name*) certify as an authorized representative of Hadleaf Holistic Greens Dispensary LLC. (*insert name of applicant*) that the applicant has executed a host community agreement with Hadley (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on March 29, 2021 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Carolyn Brennan, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Hadley (*insert name of host community*) to certify that the applicant and Town of Hadley (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on March 29 2021 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

I, Andrew Wielblad, (*insert name*) attest as an authorized representative of Hadleaf Holistic Greens Dispensary LLC. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on May 13, 2021 (*insert date*).

2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on Hadley (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).*

3. A copy of the meeting notice was also filed on April 27, 2021 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).

4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on May 5, 2021 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

5. Information was presented at the community outreach meeting including:
    a. The type(s) of Marijuana Establishment 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 Marijuana Establishment to prevent diversion to minors;
    d. A plan by the Marijuana Establishment to positively impact the community; and
    e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

From: <legals@gazettenet.com>
Date: Tue, May 4, 2021, 11:09 AM
Subject: Classified Ad Confirmation
To: <hadleafholistic@gmail.com>

ATTACHMENT A

Good morning Here is your receipt showing the ad paid in full. :) Have a great day!

Advertising Receipt

CREDIT LEGALS
115 CONZ ST
NORTHAMPTON, MA 01060
Cust#:22224
Ad#:128877
Phone#:413-586-1700
Date:05/04/2021

Salesperson: PAM PAQUETTE **Classification: Legals** **Ad Size: 1.0 x 7.80**

Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
Daily Hampshire Gazette	05/05/2021	05/05/2021	1	383.92	383.92

Payment Information:

Date:	Order#	Type
05/03/2021	128877	CreditCard

Total Amount: 383.92
Tax: 0.00
Total Payments: 383.92
Amount Due: 0.00

- Thank you for your business!

ATTACHMENT A

The Daily Hampshire Gazette

115 Conz Street, Northampton, MA

413-584-5000 | Fax: 413-584-5299 | Customer Service 413-586-1925

OUTREACH MEETING

Notice is hereby given that Hadleaf Holistic Greens Dispensary LLC ("Hadleaf Holostics") will hold a Virtual Community Outreach Meeting at 7:00 p.m. on May 13th 2021 to discuss the proposed siting of a licensed marijuana retailer facility at 251 Russell St Hadley MA 01035.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq. Questions can be submitted prior to the meeting via email to hadleafholistic@gmail.com to be answered during the Virtual Community Outreach Meeting. The full presentation will be also available for view at www.hadleafdispensary.com 24 hours prior to the Virtual Community Outreach Meeting.

The Virtual Community Outreach Meeting via Zoom is available using the following link:

https://zoom.us/j/98021228978?pwd=RHJYZXZSRkxzenVzTTFQYUYxL29pZz09

Meeting ID: 980 2122 8978
Passcode: 263707
One tap mobile

+13126266799,98021228978#,,*263707# US (Chicago)

+19292056099,98021228978#,,*263707# US (New York)

Dial by your location
+1 312 626 6799 US (Chicago)
+1 929 205 6099 US (New York)
+1 301 715 8592 US (Washington DC)
+1 346 248 7799 US (Houston)
+1 669 900 6833 US (San Jose)
+1 253 215 8782 US (Tacoma)
Meeting ID: 980 2122 8978
Passcode: 263707
Find your local number: https://zoom.us/u/abirwBGjiy

May 5

128877

ATTACHMENT B

From: **Hadleaf Holistics** <hadleafholistic@gmail.com>
Date: Tue, Apr 27, 2021 at 9:27 PM
Subject: Hadleaf Community outreach
To: Carolyn Brennan <townadmin@hadleyma.org>, <info@hadleyma.org>

Hello Guys I wanted to get our community outreach scheduled for the new location. Let me know when the soonest date we can do that and below is the text for the announcement same as last one we changed the address just need to change the date to what works best for you guys we need to give 7 days notice as far as publishing in the local paper. We will need a zoom link set up as well. Thank you

Notice is hereby given that Hadleaf Holistic Greens Dispensary LLC ("Hadleaf Holostics") will hold a Virtual Community Outreach Meeting at 6:30 p.m. on August 6th 2020 to discuss the proposed siting of a licensed marijuana retailer facility at 251 Russell St Hadley MA 01035.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq. Questions can be submitted prior to the meeting via email to hadleafholistic@gmail.com to be answered during the Virtual Community Outreach Meeting. The full presentation will be also available for view at www.hadleafdispensary.com 24 hours prior to the Virtual Community Outreach Meeting.

The Virtual Community Outreach Meeting via Zoom is available using the following link:

From: **Health and Wellness Spot** <healthandwellnessspotusa@gmail.com>
Date: Mon, May 3, 2021 at 11:59 AM
Subject: Re: [EXTERNAL] Hadleaf comunity outreach
To: Hadley BoS and Licensing <info@hadleyma.org>

No don't need to attend just need to host it and do need hadley media to record it we need a copy of the recording

On Mon, May 3, 2021, 11:30 AM Hadley BoS and Licensing <info@hadleyma.org> wrote:

Ok- I will publish the public notice on our website and forward the information to Hadley Media for recording. Do you need any of us to attend? I can't remember from last time.

Thanks,

Jennifer Sanders James

Assistant Procurement Officer

ATTACHMENT B

Licensing Coordinator

Town of Hadley

Ph. 413.586.0221

Please be advised that the Massachusetts Secretary of State and the Massachusetts Attorney General consider e-mail to be a public record, and therefore subject to the Massachusetts Public Records Law, M.G.L. c. 66 § 10.

From: Health and Wellness Spot [mailto:healthandwellnessspotusa@gmail.com]
Sent: Monday, May 3, 2021 11:30 AM
To: Hadley BoS and Licensing
Subject: Re: [EXTERNAL] Hadleaf comunity outreach

Ok we made the paper with this in time so the 13th is a go at 7pm

On Mon, May 3, 2021, 10:59 AM Hadley BoS and Licensing <info@hadleyma.org> wrote:

Great- I was afraid I had missed something.

Thank you,

Jennifer Sanders James

Assistant Procurement Officer

Licensing Coordinator

Town of Hadley

Ph. 413.586.0221

Please be advised that the Massachusetts Secretary of State and the Massachusetts Attorney General consider e-mail to be a public record, and therefore subject to the Massachusetts Public Records Law, M.G.L. c. 66 § 10.

From: Health and Wellness Spot [mailto:healthandwellnessspotusa@gmail.com]
Sent: Monday, May 3, 2021 10:59 AM
To: Hadley BoS and Licensing
Subject: Re: [EXTERNAL] Hadleaf comunity outreach

I am sorry I ment I will reach out to them thank you

On Mon, May 3, 2021, 9:05 AM Hadley BoS and Licensing <info@hadleyma.org> wrote:

HI Matt,

ATTACHMENT B

Who am I reaching out too?

Jennifer Sanders James

Assistant Procurement Officer

Licensing Coordinator

Town of Hadley

Ph. 413.586.0221

Please be advised that the Massachusetts Secretary of State and the Massachusetts Attorney General consider e-mail to be a public record, and therefore subject to the Massachusetts Public Records Law, M.G.L. c. 66 § 10.

From: Health and Wellness Spot [mailto:healthandwellnessspotusa@gmail.com]
Sent: Friday, April 30, 2021 7:49 PM
To: Hadley BoS and Licensing
Subject: Re: [EXTERNAL] Hadleaf comunity outreach

Ok great thank you will reach out to them

On Fri, Apr 30, 2021, 3:54 PM Hadley BoS and Licensing <info@hadleyma.org> wrote:

HI Matt,

We are actually going to ask that you place the ad in the paper this time – I will provide you with the contact information below:

They will have to inform you on the publication dates available and we can go from there – I can adjust the zoom link as needed for your meeting and coordinate with Hadley Media for you. If the 13th is still able to meet the advertising deadlines here is the zoom link below:

Daily Hampshire Gazette : legals@gazettenet.com

Here is the zoom link:

Topic: Hadleaf Community Outreach

Time: May 13, 2021 07:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

https://zoom.us/j/98021228978?pwd=RHJYZXZSRkxzenVzTTFQYUYxL29pZz09

ATTACHMENT B

Meeting ID: 980 2122 8978

Passcode: 263707

One tap mobile

+13126266799,,98021228978#,,,,*263707# US (Chicago)

+19292056099,,98021228978#,,,,*263707# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)

+1 929 205 6099 US (New York)

+1 301 715 8592 US (Washington DC)

+1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 980 2122 8978

Passcode: 263707

Find your local number: https://zoom.us/u/abirwBGjiy

Please let me know if you have any questions.

Thank you,

Jennifer Sanders James

Assistant Procurement Officer

Licensing Coordinator

Town of Hadley

Ph. 413.586.0221

ATTACHMENT B

Please be advised that the Massachusetts Secretary of State and the Massachusetts Attorney General consider e-mail to be a public record, and therefore subject to the Massachusetts Public Records Law, M.G.L. c. 66 § 10.

From: Health and Wellness Spot [mailto:healthandwellnessspotusa@gmail.com]
Sent: Friday, April 30, 2021 2:24 PM
To: Hadley BoS and Licensing
Subject: [EXTERNAL] Hadleaf comunity outreach

Hello Jennifer just touching base with you on confirmation of the 13th good for our outreach and if we have to get you a payment for the notification in the paper. Let me know thank you

ATTACHMENT C

Notice is hereby given that Hadleaf Holistic Greens Dispensary LLC (“Hadleaf Holostics”) will hold a Virtual Community Outreach Meeting at 7:00 p.m. on May 13th 2021 to discuss the proposed siting of a licensed marijuana retailer facility at 251 Russell St Hadley MA 01035.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission’s Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq. Questions can be submitted prior to the meeting via email to hadleafholistic@gmail.com to be answered during the Virtual Community Outreach Meeting. The full presentation will be also available for view at www.hadleafdispensary.com 24 hours prior to the Virtual Community Outreach Meeting.

The Virtual Community Outreach Meeting via Zoom is available using the following link:

https://zoom.us/j/98021228978?pwd=RHJYZXZSRkxzenVzTTFQYUYxL29pZz09

Meeting ID: 980 2122 8978
Passcode: 263707
One tap mobile
+13126266799,,98021228978#,,,,*263707# US (Chicago)
+19292056099,,98021228978#,,,,*263707# US (New York)

Dial by your location
- +1 312 626 6799 US (Chicago)
- +1 929 205 6099 US (New York)
- +1 301 715 8592 US (Washington DC)
- +1 346 248 7799 US (Houston)
- +1 669 900 6833 US (San Jose)
- +1 253 215 8782 US (Tacoma)

Meeting ID: 980 2122 8978
Passcode: 263707
Find your local number: https://zoom.us/u/abirwBGjiy

Amendment D

Number Of Participants In Community Outreach

The community outreach hosted by Hadleaf Holistic Greens Dispensary LLC on May 13th 2021 at 7pm had 1 participant during the live zoom meeting and has since had another 13 views on the Hadley MA youtube.com page.

Hadleaf Holistic Greens Dispensary LLC.

Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Hadleaf Holistic Greens Dispensary LLC will remain in compliance and ensure that the Marijuana Establishment is and will remain compliant with local codes, ordinances and bylaws for the physical address of our Marijuana Establishment at 251 Russell Street in Hadley MA. which includes, but is not limited to, the identification of any local licensing requirements for the adult use of marijuana.

Per the Hadley Zoning Bylaws, Adult Use Marijuana Retail Establishments are allowed in the Business Zoning District. Our location at 251 Russell Street, Hadley, MA is within the Business (B) zoning district and compliant with all requirements set by the town of Hadley MA. We have also executed a Host Community Agreement with the Town of Hadley MA and received the required special permit for Marijuana Retail Establishments from the town of Hadley MA planning board, which decision has been provided separately to the Cannabis Control Commission of the Commonwealth of Massachusetts as part of this Application.

Plan

It is the intention of Hadleaf Holistic Greens Dispensary LLC to remain compliant with all relevant local codes, and ordinances applicable to a Marijuana Establishment. In addition to Hadleaf Holistic Greens Dispensary LLC remaining compliant with the existing Hadley Zoning Bylaw, our management team and owner will continually engage with the Town of Hadley to remain up to date with local codes zoning ordinances and by-laws, to remain fully compliant.

Hadleaf Holistic Greens Dispensary LLC.: Plan for Positive Impact

Plan to Positively Impact Areas of Disproportionate Impact

Intent

Hadleaf Holistic Greens Dispensary LLC. ("Hadleaf") is committed to do our part in positively impacting areas of disproportionate impact. Our plan focuses on employment and the use of suppliers, contractors and partners who have been historically harmed by marijuana prohibition.

Hadleaf and Product manufacturing establishment is approximately 6 miles away from Greenfield and our Retail establishment is in Hadley which abuts the Town of Amherst. Greenfield and Amherst have been designated as "Area of Disproportionate Impact" by the Commission.

It is our plan to engage employees, suppliers, contractors and other partners from areas designated "Area of Disproportionate Impact" by the Commission, which includes Greenfield and Amherst when possible, as these locales are close to the location of the retail establishment.

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

Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure that Hadleaf promotes and encourages full participation in Hadleaf operations by individuals from communities disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities while supporting the company's mission.

Plan for Positive Impact Populations ("Plan Populations"):

1. Past or present residents of the geographic "areas of disproportionate impact," which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact, specifically Greenfield and Amherst.

2. Commission-designated Economic Empowerment Priority applicants;

3. Commission-designated Social Equity Program participants;

4. Massachusetts residents who have past drug convictions; and

5. Massachusetts residents with parents or spouses who have drug convictions.

Plan for Employment Plan

GOAL: Positively impact areas of disproportionate impact by providing good-paying jobs with benefits and to develop long-term career opportunities.

PROGRAMS FOR ACHEIVING GOALS:

Our goal is to hire ~20% of our employees meet the criteria of the Plan Populations described above. Hiring Priority1.

Priority will be given to:

a. Residents from areas of disproportionate impact, with an additional priority given to Greenfield and Amherst residents;

b. Commission-designated Social Equity Program participants;

c. Massachusetts residents who have past drug convictions; and

d. Massachusetts residents with parents or spouses who have drug convictions.

2. We will engage with MassHire Franklin Hampshire Career Center which is a Massachusetts One Stop Career Center, Reliable Temps, Inc and Staffing Network, LLC. These organizations all serve the Greenfield and Amherst population. Hadleaf will post all job posing through these organizations and will engage in job fairs and other services that are offered. Our Job Posting will all promote our hiring priority and encourage individuals who meet the criteria of our Plan Populations to apply.

a. We will hold at least one job fair within 2 months prior to our expected opening date. The location of this job fair will be convenient to Greenfield and Amherst residents and our hiring preference will be outlined in all advertising of the fair.

b. We expect to have another job fair within 6 months of the first job fair.

c. Subsequent job fairs will be held as needed.

Suppliers, Contractors and Partners Plan.

Hadleaf will engage and contract with individuals who meet the Plan Populations outlined previously in this plan

GOAL: To positively impact areas of disproportionate impact by partnering with individuals and businesses whose owners or majority of its employees meet the Plan Populations outlined previously in this plan

PROGRAMS FOR ACHIEVING GOALS:

To the extent possible and reasonable, Hadleaf plans to utilize suppliers, contractors and other partners who meet the criteria outlined above. We will give preference to these individuals and businesses when choosing our partners.

1. It is our goal that ~20% of our vendors, contractors and builders will be sourced locally from Greenfield or whose owners or employees are individuals who qualify for the Commissions Social Equity Program.

2. Hadleaf will make reasonable efforts to identify and source Suppliers, Contractors and Wholesale Partners who meet the Positive Impact Population criteria. Preference will be given to these individuals and companies.

a. We will promote this plan when soliciting bids for services.

b. This plan will be promoted on our website.

c. Hadleaf will source bids directly from companies in Greenfield and Amherst.

d. Companies who seek this preference will need to provide the demographics of the ownership and/or employees of the company.

3. Priority for engaging and contracting with other Marijuana Establishments in wholesale relationships will be given to Marijuana Establishments that are Economic Empowerment priority applicants or employ a majority of their employees that meet the Plan Populations outlined above. Measurement and Accountability Quarterly, the executive management team along with the Human Resources Director will meet and review the progress of this plan and to make adjustments and changes if necessary. 60 days prior to our license renewal date, and annually thereafter Hadleaf will produce a comprehensive report that will be made available to the Commission for review during the renewal process. This report will include the following metrics that will be used to measure the progress or success of the Plan.

At a minimum this data will include:

1. Number and percentage of employees hired, retained, or promoted that come from populations identified in the Plan Population;

2. The demographics of all employees, applicants, new hires and promotions;

3. Number and types of jobs created in the adult-use cannabis industry in geographic areas of disproportionate impact;

4. Recruitment and hiring data including job postings, advertising, sourcing of candidates, offers of employment, and actual hires;

5. The number and percentage of suppliers, contractors and other partners that meet the criteria identified in the Plan Population; and

6. A comprehensive ledger on all expenses, contracts and agreements that includes whether or not the expense is a qualifying one under this plan's goals.

This report to be made available to the Commonwealth of Massachusetts and the Town of Hadley.

Hadleaf Managers and appropriate community stakeholders will meet to discuss the report and make any necessary adjustments

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

mass.gov/dor

Letter ID: L0757403456
Notice Date: May 24, 2021
Case ID: 0-001-174-965

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

HADLEAF HOLISTIC GREENS DISPENSAR
14 PINNACLE RIDGE RD
FARMINGTON CT 06032-3008

000028

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, HADLEAF HOLISTIC GREENS DISPENSARY 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

Use the confirmation code below to print another copy of this letter or to review your submission.

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

William Francis Galvin
Secretary of the
Commonwealth

July 27, 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

HADLEAF HOLISTIC GREENS DISPENSARY LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 23, 2019.**

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: **ANDREW WIELBLAD**

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

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **ANDREW WIELBLAD**



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:TAA

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: 001416864

1. The exact name of the limited liability company is: HADLEAF HOLISTIC GREENS DISPENSARY LLC

2a. Location of its principal office:

No. and Street: 367 RUSSELL ST
UNITE F04
City or Town: HADLEY State: MA Zip: 01035 Country: USA

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

No. and Street: 367 RUSSELL ST
UNITE F04
City or Town: HADLEY State: MA Zip: 01035 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:
ORGANIZING TO APPLY FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: LEGALINC CORPORATE SERVICES INC.
No. and Street: 1900 WEST PARK DRIVE
SUITE 280B
City or Town: WESTBOROUGH State: MA Zip: 01581 Country: USA

I, PATTY SCLIMENTI ON BEHALF OF LEGALINC CORPORATE SERVICE resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

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

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	ANDREW WIELBLAD	200 WAMPHASSUC RD, STONINGTON, CT 06378 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ANDREW WIELBLAD	200 WAMPHASSUC RD, STONINGTON, CT 06378 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 23 Day of December, 2019,
LOVETTE DOBSON

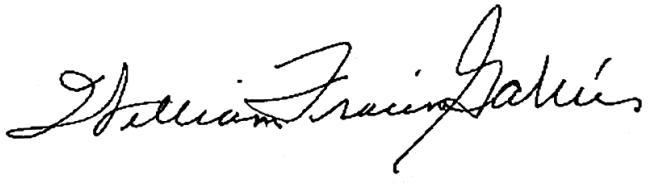
(The certificate must be signed by the person forming the LLC.)

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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:

December 23, 2019 03:05 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

IRS DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

Date of this notice: 12-26-2019

Employer Identification Number:
84-4079697

Form: SS-4

Number of this notice: CP 575 G

HADLEAF HOLISTIC GREENS DISPENSARY
LLC
ANDREW WIELBLAD SOLE MBR
367 RUSSELL ST UNIT E
HADLEY, MA 01035

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN 84-4079697. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

* Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
* Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
* Refer to this EIN on your tax-related correspondence and documents.

If you have questions about your EIN, you can call us at the phone number or write to us at the address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you do not need to write us, do not complete and return the stub.

Your name control associated with this EIN is HADL. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.

(IRS USE ONLY) 575G 12-26-2019 HADL O 9999999999 SS-4

Keep this part for your records. CP 575 G (Rev. 7-2007)

Return this part with any correspondence so we may identify your account. Please correct any errors in your name or address.

CP 575 G

9999999999

Your Telephone Number
( ) -
_____

Best Time to Call
_____

DATE OF THIS NOTICE: 12-26-2019
EMPLOYER IDENTIFICATION NUMBER: 84-4079697
FORM: SS-4 NOBOD

INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

HADLEAF HOLISTIC GREENS DISPENSARY LLC
ANDREW WIELBLAD SOLE MBR
367 RUSSELL ST UNIT E
HADLEY, MA 01035

LIMITED LIABILITY COMPANY
OPERATING AGREEMENT OF
HADLEAF HOLISTIC GREENS DISPENSARY LLC

This agreement is made effective on the _____ day of _____, _____ among the member(s) and the company.

1. Formation. A limited liability company (LLC) of the above name has been formed under the laws of the State of Massachusetts by filing Articles of Organization (or similar organizing document) with the Secretary of State (or other appropriate office) on 12/23/2019. The purpose of the business shall be to carry on any activity which is lawful under the jurisdiction in which it operates. The LLC may operate under a fictitious name or names as long as the LLC is in compliance with applicable fictitious name registration laws. The term of the LLC shall be perpetual or until dissolved as provided by law or by vote of the member(s) as provided in this agreement. Upon dissolution the remaining members shall have the power to continue the operation of the LLC as long as necessary and allowable under state law until the winding up of the affairs of the business has been completed.

2. Members. The name and address of each initial limited liability company member is:

ANDREW WIELBLAD
200 WAMPHASSUC RD
STONINGTON , CT 06378

3. Contributions. The capital contribution of each limited liability company member in exchange for their LLC ownership is:

Name	**LLC Ownership**	**Capital Contribution**
ANDREW WIELBLAD	100%	**$**_____

NOTE: The capital contribution may be in the form of cash (or cash equivalents), labor or services (past or future), or property/equipment/assets other than cash. Regardless of the type of capital contribution, it should be expressed above in a dollar equivalent value that is agreed upon by all limited liability company members. Additionally, there may be accounting/tax ramifications for individuals contributing capital other than cash.

4. Profit and Loss. The profits and losses of the limited liability company shall be distributed amongst the members in proportion with the ownership of each member by default, but this may be changed at any time upon a unanimous vote of the members.

5. Distributions. The limited liability company shall have the power to make distributions to its members in such amounts and at such intervals as a majority of the members deem appropriate according to law.

6. Management. The limited liability company shall be managed by all LLC members. Any member may bind the LLC in all matters in the ordinary course of LLC business. In the event of a dispute between members, final determination shall be made with a vote by the members, votes being proportioned according to capital contributions.

7. Registered Agent. For receipt of official legal and tax correspondence from the State of Massachusetts, the registered agent of the limited liability company (sometimes known as a resident agent, statutory agent, agent for service of process, or delivery of service address) shall be maintained in accordance with the requirements of the State of Massachusetts.

8. Assets. The assets of the limited liability company shall be registered in the legal name of the LLC and not in the names of the individual members, unless approved by a majority vote of the members.

9. Records and Accounting. The limited liability company shall keep an accurate accounting of its affairs using any method of accounting allowed by law. All members shall have a right to inspect the records during normal business hours. The members shall have the power to hire such accountants as they deem necessary or desirable.

10. Banking. The members of the limited liability company shall be authorized to set up bank accounts as in their sole discretion are deemed necessary and are authorized to execute any banking resolutions provided by the institution in which the accounts are being set up, or by adopting their own resolution.

11. Taxes. The limited liability company shall file such tax returns as required by law. The LLC shall elect to be taxed as a majority of the members decide is in their best interests. The "tax matters partner," as required by the Internal Revenue Code, shall be appointed by unanimous consent of the members.

12. Separate Entity. The limited liability company is a legal entity separate from its members. No member shall have any separate liability for any debts, obligations, or liability of the LLC except as provided in this agreement.

13. Indemnity and Exculpation. The limited liability company shall indemnify and hold harmless its members, managers, employees, officers, and agents to the fullest extent allowed by law for acts or omissions done as part of their duties to or for the LLC. Indemnification shall include all liabilities, expenses, attorney and accountant fees, and other costs reasonably expended. No member shall be liable to the LLC for acts done in good faith.

14. Meetings. The members shall have no obligation to hold annual or any other meeting, but may hold such meetings if they deem them necessary or desirable.

15. Amendment of this Agreement. This agreement may not be amended except in writing signed by all of the members.

16. Conflict of Interest. No member shall be involved with any business or undertaking which competes with the interests of the limited liability company except upon agreement in writing by all of the members.

17. Deadlock. In the event that the members cannot come to an agreement on any matter the members agree to submit the issue to mediation to be paid for by the limited liability company. In the event the mediation is unsuccessful, they agree to seek arbitration under the rules of the American Arbitration Association.

18. Dissociation of a Member. A member shall have the right to discontinue membership upon giving thirty days notice. A member shall cease to have the right to membership upon death, court-ordered incapacity, bankruptcy or expulsion. The limited liability company shall have the right to buy the interest of any dissociated member at fair market value.

19. Dissolution. The limited liability company shall dissolve upon the unanimous consent of all the members or upon any event requiring dissolution under state law. In the event of the death, bankruptcy, permanent incapacity, or withdrawal of a member the remaining members may elect to dissolve or to continue the operation of the LLC.

20. General Provisions. This agreement is intended to represent the entire agreement between the parties. In the event that any party of this agreement is held to be contrary to law or unenforceable, said party shall be considered amended to comply with the law and such holding shall not affect the enforceability of other terms of this agreement. This agreement shall be binding upon the heirs, successors, and assigns of the members.

IN WITNESS whereof, the members of the limited liability company sign this agreement and adopt it as their operating agreement this _____ day of _____, _____.

_____

ANDREW WIELBLAD , MEMBER

STATE *of* MASSACHUSETTS
STATEMENT *and* RESIGNATION *of the* ORGANIZER
A LIMITED LIABILITY COMPANY

The undersigned, the Organizer of **HADLEAF HOLISTIC GREENS DISPENSARY LLC**, who signed and filed its Articles of Organization (or similar organizing document) with the Massachusetts Secretary of State (or other appropriate state office), appoints the following individuals to serve as members of the limited liability company:

Name and address of each initial member:

ANDREW WIELBLAD
200 WAMPHASSUC RD
STONINGTON, CT 06378

Additionally, the undersigned does hereby tender his/her resignation as Organizer for the LLC, and from any and all involvement with, control of, or authority over the LLC, real or perceived, effective immediately.

Dated: December 26th, 2019

Lovette Dobson

Lovette Dobson, Organizer

BANKING RESOLUTION OF
HADLEAF HOLISTIC GREENS DISPENSARY LLC

The undersigned, being a member of the above limited liability company authorized to sign this resolution, hereby certifies that on the _____ day of _____, _____ the members of the limited liability company adopted the following resolution:

RESOLVED, that the limited liability company open bank accounts with _____ and that the members of the company are authorized to take such action as is necessary to open such accounts; that any _____ of the following person(s) shall have signature authority over the account:

ANDREW WIELBLAD

and, that said resolution has not been modified or rescinded.

Date:_____

Signature:_____

ANDREW WIELBLAD

LIMITED LIABILITY COMPANY
OPERATING AGREEMENT OF
HADLEAF HOLISTIC GREENS DISPENSARY LLC

This agreement is made effective on the 12 day of December, 2019 among the member(s) and the company.

1. Formation. A limited liability company (LLC) of the above name has been formed under the laws of the State of Massachusetts by filing Articles of Organization (or similar organizing document) with the Secretary of State (or other appropriate office) on 12/23/2019. The purpose of the business shall be to carry on any activity which is lawful under the jurisdiction in which it operates. The LLC may operate under a fictitious name or names as long as the LLC is in compliance with applicable fictitious name registration laws. The term of the LLC shall be perpetual or until dissolved as provided by law or by vote of the member(s) as provided in this agreement. Upon dissolution the remaining members shall have the power to continue the operation of the LLC as long as necessary and allowable under state law until the winding up of the affairs of the business has been completed.

2. Members. The name and address of each initial limited liability company member is:

ANDREW WIELBLAD
200 WAMPHASSUC RD
STONINGTON , CT 06378

3. Contributions. The capital contribution of each limited liability company member in exchange for their LLC ownership is:

Name	LLC Ownership	Capital Contribution
ANDREW WIELBLAD	100%	$ 100,000.00

NOTE: The capital contribution may be in the form of cash (or cash equivalents), labor or services (past or future), or property/equipment/assets other than cash. Regardless of the type of capital contribution, it should be expressed above in a dollar equivalent value that is agreed upon by all limited liability company members. Additionally, there may be accounting/tax ramifications for individuals contributing capital other than cash.

4. Profit and Loss. The profits and losses of the limited liability company shall be distributed amongst the members in proportion with the ownership of each member by default, but this may be changed at any time upon a unanimous vote of the members.

5. Distributions. The limited liability company shall have the power to make distributions to its members in such amounts and at such intervals as a majority of the members deem appropriate according to law.

17. Deadlock. In the event that the members cannot come to an agreement on any matter the members agree to submit the issue to mediation to be paid for by the limited liability company. In the event the mediation is unsuccessful, they agree to seek arbitration under the rules of the American Arbitration Association.

18. Dissociation of a Member. A member shall have the right to discontinue membership upon giving thirty days notice. A member shall cease to have the right to membership upon death, court-ordered incapacity, bankruptcy or expulsion. The limited liability company shall have the right to buy the interest of any dissociated member at fair market value.

19. Dissolution. The limited liability company shall dissolve upon the unanimous consent of all the members or upon any event requiring dissolution under state law. In the event of the death, bankruptcy, permanent incapacity, or withdrawal of a member the remaining members may elect to dissolve or to continue the operation of the LLC.

20. General Provisions. This agreement is intended to represent the entire agreement between the parties. In the event that any party of this agreement is held to be contrary to law or unenforceable, said party shall be considered amended to comply with the law and such holding shall not affect the enforceability of other terms of this agreement. This agreement shall be binding upon the heirs, successors, and assigns of the members.

IN WITNESS whereof, the members of the limited liability company sign this agreement and adopt it as their operating agreement this 12 **day of** December 2019

ANDREW WIELBLAD , MEMBER

AFFIDAVIT

PERSONALLY came and appeared before me, the undersigned Notary the within named Andrew Wielblad (owner of Hadleaf Holistic Greens Dispensary LLC) , who is a resident of 200 Wamphassuc Rd Stonington, CT 06378, and makes this his statement and affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his knowledge:

Hadleaf Holistic Greens Dispensary LLC cannot register with the Department Of Unemployment Assistance because Hadleaf Holistic Greens Dispensary LLC does not yet have employees.

DATED this 15 day of December 2021

Signature of Affiant _____

SWORN to subscribed before me, this 15 day of December, 2021

NOTARY PUBLIC Melinda Hemson

My Commission Expires: 2/28/2025

Melinda Hemson
Notary Public-Connecticut
My Commission Expires
February 28, 2025

Hadleaf Holistic Greens Dispensary LLC

Business Plan

Outline

1) Executive Summary

2) Market Analysis

3) Organization & Management

4) Products

5) Marketing

6) Growth

7) Financial Projections

Executive Summary

Hadleaf Holistic Greens Dispensary LLC (Hadleaf) will be located at 251 Russell St in Hadley, MA. We have been able to lease this facility for 10 years with two 5-year renewals and the option of acquiring the property the property when we would want to at a preset price. The facility is well positioned in the business district on route 9 in Hadley, MA and it matches the ideal picture of a community Cannabis dispensary store. We are not going to spend much to facelift the facility. Before taking over the facility, it was used as a CrossFit gym and remains in good condition. The business will be launching with just one location in Hadley, MA. Hadleaf will be involved in the retailing of recreational marijuana. We are in the recreational marijuana dispensary business to retail recreational marijuana as permitted by the law in Massachusetts to our customers with pride in providing the best quality and largest variety of products in the area. Our employees will be well trained and qualified to handle the wide range of customers that we are positioned to serve. We will engage in the sale of marijuana products and marijuana related products, both at the counter and online pre-orders. Hadleaf plans to operate 7 days a week from 10am to 8am as a marijuana dispensary store.

Our workforce is going to be well trained to operate within the framework of our company's corporate culture and to meet the needs of all our customers. Hadleaf will ensure that all our customers are given first class treatment whenever they visit our store. We will ensure that we get our customers involved in the selection of brands that will be on our racks. We will additionally ask for customer input in some business decisions. Hadleaf is a small business that is owned and managed by Andrew Wielblad. Andrew Wielblad is going to be the Chief Executive Officer of the business; he has over 15 years in owning and running businesses that sell alcohol and partake in state lottery. Therefore, he is well versed in dealing with sales of heavily regulated and controlled goods.

Our products aside from the dispensary of recreational marijuana, which is our core products, Hadleaf will retail a wide range of related products such as glass pieces, flower grinders and lighters from different manufacturing brands to customers who are based in the Hadley, MA area.

Our Vision Statement

Our vision is to become the most versatile, quality-focused & knowledgeable recreational marijuana dispensary store in Hadley, MA and the surrounding areas.

Our Mission Statement

Our mission is to establish a first-class recreational marijuana dispensary store that will not only retail recreational marijuana but also make available a wide range of generic and

branded products from top growers and manufacturing brands at competitive prices to the residence of Hadley, MA and other towns in the Western MA area.

Business Structure

Hadleaf is a business that will be built on a solid foundation. From the outset, we have decided to recruit the most qualified people to hold various job positions in our organization. We are quite aware of the rules and regulations governing the recreational marijuana industry, which is why we decided to aim to recruit experienced and qualified employees to be the foundational staff of the organization. We hope to leverage on their expertise to build our business brand as a premiere recreational marijuana dispensary within the Hadley, MA area. When hiring, we will look for applicants that are not just qualified and experienced, but honest, customer-centric and willing to put in the hours it takes to help us build a prosperous business that will benefit all of our workforce, and customers. As a matter of fact, bonus arrangements will be made available to all of our management and staff based on their performance during given periods.

Market Analysis

Market Trends

The market trend in the retail industry of which the recreational marijuana dispensary business falls under is directly influenced by the state of Massachusetts policies. The fact that the recreational marijuana industry is highly regulated means that any entrepreneur who wants to run a recreational marijuana dispensary business must be ready to play by the book or they will be booted out of business. Several other factors influence market trends in the industry, and it is normal to see bigger recreational marijuana dispensary stores (especially those with chains of stores) weather the storm whenever there are major shakes in the industry. In essence, the easiest way to build a solid and highly profitable recreational marijuana dispensary business is to engage in opening an outlet in key high traffic location in MA. Undoubtedly, the industry will continue to grow and become more profitable due to the aging baby-boomer generation in Massachusetts which is projected to drive increasing demand for recreational marijuana. Recreational marijuana dispensary stores are now making use of technology to effectively manage their business by plugging financial leakages which happens to be one of the biggest challenges that retail businesses faces. The use of technology is very effective in helping retail businesses manage their business and market to a specific clientele base.

Our Target Market

Hadleaf is in business to service a wide range of customers. We will ensure that we target 21 and older walk-in customers and online pre-order customers. The fact that we are going to open our doors to a wide range of customers does not in any way stop us from targeting those groups that we may find not attracting as much of once up and operating. Our staff is trained to

effectively service our customers and still play by the rules governing the industry. Our customers can be categorized into the following categories;

- Households
- Corporate Executives
- Businesspeople
- Elderly people
- Sports Men and Women
- Mid-Twenties
- Middle aged people – who are usually working stressed from work and may have insomnia

We believe we possess several strengths that will allow us to always remain visible on the business radar.

The retail recreational marijuana industry is known to be highly competitive in the state of Massachusetts. The industry is growing and there are alternative ways through which customers can purchase products. There are also plenty of alternative retail locations in the Hadley, MA area some are small businesses like ours and some are large corporations that can offer lower prices on products these are both real competitors in the industry. These competitors ensure that they do all that lies within their power to gain a favorable market share of the available market in any given region. In this industry, most of the competitive dynamics center around the quality of cannabis dispensed, the service offered, the location where the dispensary is at, discounts offered for the products, and to some extent, the branding of the business plays a significant role. Even though competition is stiff especially from the big, well-backed enterprises, smaller enterprises can still get their fair share of the market if they stay true to the competitive dynamics. It is a fact that small recreational marijuana dispensaries will always struggle with larger recreational marijuana dispensaries & chains when it comes to pricing power and brand recognition which is why a smaller retail store always goes out of their ways to deliver excellent customer service. It is through top notch customer service that they can secure a fair share of the available market.

Hadleaf is entering into the market well prepared to favorably compete in the industry. Our store is well positioned and highly visible. We have plenty of parking space available with good security. Our management staff will be well groomed in retail recreational marijuana and all our employees will be trained to provide customized customer service to all of our customers. We are going to be the closest recreational marijuana dispensary store in the Hadley, MA area to the main highway i91. We will have enough staff ready to run a shift system to always provide the best customer service.

Organization & Management

The following positions will be available at Hadleaf;

- CEO (owner)
- General Manager
- Assistant Manager (2)
- Security Agents
- Cashier (Counter Agents)

Roles and Responsibilities

The responsibilities of each position within the dispensary will be broken down as detailed below.

Chief Executive Officer – CEO:

- Responsible for providing business direction
- Responsible for creating, communicating, and implementing the organization's vision, mission, and overall direction – i.e., leading the development and implementation of the overall organization's strategy
- Responsible for fixing prices and signing business deals
- Responsible for payment of salaries
- Responsible for signing checks and documents on behalf of the company
- Evaluates the success of the organization

General Manager:

- Responsible for managing the daily activities in the company (dispensary store)
- Responsible for recruiting, training and managing staff
- Responsible for ordering, selling and controlling marijuana products and other stock

- Responsible for meeting with product & vendor representatives
- Responsible for managing the organizations' budgets
- Responsible for keeping statistical and financial records
- Responsible for preparing instore materials and displays
- Oversees marketing services
- Interfaces with third – party providers (vendors)
- Controls the sales floor inventory
- Supervises the entire sales staff and workforce
- Handles any other duty as assigned by the CEO

Assistant Manager

- Manages and assists the manager with vendor relations, market visits, and the ongoing education and development of the organizations' buying teams
- Helps to ensure consistent quality of products on our rack
- Responsible for helping the manager with the purchase of goods and products for the organizations
- Responsible for planning sales, monitoring inventory, selecting the merchandise, and writing and pricing orders to vendors
- Ensures that the organization operates and oversees the staff when Manager is not present
- Ensures that the store facility is in tip top shape and conducive enough to welcome customers (This includes turning on equipment such as computers, scales, printers and fax machines)
- Ensures that goods and products are properly arranged
- Responsible for organizing and attending community events
- Responsible for making sure the store is being cleaned by staff
- Handles administrative and bookkeeping tasks, inventory control, stocking shelves, and data entry
- Performs monthly inventory counts, file paperwork, and stock inventory
- Responsible for promoting the company's image

- Responsible for creating marketing and promotional strategies, etc.
- Represents the organization in some strategic business meetings
- Handles any other duty as assigned by the General Manager

Security Agents

- Great the customers at the front door & check ID's ensuring all that enter are 21 and older
- Keep control of the flow of customers into the store
- Make sure staff and customers are safe inside of the store
- Disperse any loitering in the parking lot
- Help preventing theft in the store by customers and staff
- Over seeing the security system and pulling up events on the cameras when needed
- Making sure the flow of customer traffic moves smoothly inside of the store
- Escorting staff to their car at the end of the night

Cashier (Counter Agent):

- Receives payments on behalf of the organization
- Issues receipt to customers
- Closes and opens registers everyday
- Handles financial transaction on behalf of the company
- Creates content for social media posts
- Makes sure the front of store is stocked with products for sale
- Responsible for keeping the store facility clean at all times
- Ensures that toiletries and supplies don't run out of stock
- Handles any other duty as assigned by the assistant manager

Products

Our core product as a recreational marijuana dispensary will be recreational marijuana which will come in a variety of different products such as flower, concentrates & Edibles. Aside from the dispensary of recreational marijuana, Hadleaf will sell marijuana related products such as glass smoking devices, rolling papers & lighters. At Hadleaf, we will ensure that we have a wide range of products. It will be difficult for customers to visit our store and not find the product that they are looking for. One of our business goals is to make our recreational marijuana dispensary store a one stop shop.

Marketing

The marketing and sales strategy of Hadleaf will be based on generating long-term personalized relationships with customers. To achieve that, we will ensure that we offer the largest variety and best quality in the Hadley, MA area. We will also ensure that we have a wide range of other marijuana related products in stock. All our employees will be well trained and equipped to provide excellent and knowledgeable customer service. We know that if we are consistent with offering high quality recreational marijuana and excellent customer service, we will increase the number of our customers by more than 25% for the first year and then more than 30% subsequently. Before choosing a location for our recreational marijuana dispensary store, we conducted a thorough market survey and feasibility scouted in order for us to be able to penetrate the available market and become the preferred choice for residence of the Hadley, MA area. We have detailed information on what we will be able to do to structure our business to attract the numbers of customers we want to attract at a given time. We will hire staff who have a solid understanding of the retail industry to help us develop marketing strategies that will allow us to achieve our business goal of winning a larger percentage of the available market in the Hadley, MA area. We do not view hiring the best hands in marketing as a waste of money; rather we see it as a wise investment that will guarantee a large return within a short period of time.

In summary, Hadleaf will adopt the following sales and marketing approach to win customers over;

- Introduce our business to the community by attending local business networking events and placing signage on our building along with the roadside.
- Advertise our business in industry-based publications
- List our business on online directories

- Leverage on the internet to promote our business
- Engage in direct marketing
- Leverage word of mouth marketing (referrals)
- Attend marijuana related exhibitions/expos

Publicity and Advertising Strategy

Although our recreational marijuana dispensary store is well located in Hadley, MA, we will attempt to intensify the publicity for our business. We are going to explore all available conventional and non – conventional means to promote our retail business allowed within the Massachusetts law. Hadleaf has a long-term plan of being the stand out marijuana dispensary in the Hadley, MA area, which is why we will deliberately build our brand to be well accepted in Hadley, MA. As a matter of fact, our publicity and advertising strategy is not solely for winning customers over but to effectively communicate our brand to the general public.

Here are the platforms we intend on leveraging in order to promote and advertise Hadleaf;

- Place adverts on both print and electronic media platforms
- Sponsor marijuana related programs
- Leverage on the internet and social media platforms like; Instagram, Facebook , twitter, YouTube, Google + et al to promote our brand
- Install Billboards at strategic locations around Hadley, MA
- Position our in-store advertising at strategic positions in our retail store

Our Pricing Strategy

It would be wrong to fix pricing without first determining other factors that surround costing. This is one of the reasons why we will work towards ensuring that all of our products are offered at highly competitive prices compared to what is obtainable in the area. The fact that we are going to be offering our products at comparable prices to our competitors does not in any way mean that we will sell sub – standard products. Selling our products at a price that obtainable in our competitors' stores means that we will be going with regular market rates.

Payment Options

At Hadleaf, our payment policy is all inclusive because we are quite aware that different people prefer different payment options as it suits them. Here are the payment options that will be available in all of our ; store

- Payment by cash
- Payment via debit card

In light of the above, we have chosen banking platforms that will help us achieve our payment plans without any hitches. This is very vital so that we do not lose focus.

Growth

It is the wish of any business to become so successful that there is a good succession plan to act upon. More often than not, having a good succession plan will help you know the direction your business is headed. As such, the future of a business lies in the number of loyal customers, the capacity and competence of the employees, their investment strategy and the business structure. If all of these factors are missing from a business, then it won't be long before the business closes shop. One of our major goals in starting Hadleaf is to build a business that will survive off its own cash flow without the need for injecting finances from external sources once the business is officially up and running. We know that one of the ways of gaining approval and winning customers over is to sell better quality products than what is currently obtainable in the local market. In doing so if needed, we are well prepared to survive on lower profit margin. Hadleaf will make sure the correct foundation, structures and processes are put in place to ensure that our staff is well taken of. Our company's corporate culture is designed to drive our business to greater heights and training and re – training of our workforce is top of mind to keep a excellent customer service in the store. As a matter of fact, a bonus arrangement will be made available to all our management staff and it will be based on their performance during certain periods. We know that with this policy, we will be able to successfully hire and retain the best hands we can get in the industry; they will be more committed to help us build the business of our dreams.

Financial Projections

Sources of Income

We know that it is vital to state and act on the ways through which we have decided to raise funds. Our source of income will be primarily in the retailing of recreational marijuana and other supplemental products.

Sales Forecast

One of the true marks of an effective entrepreneur is being able to forecast sales based on the magnitude of work that has been put into the business. It is important to state that our sales forecast is based on the data gathered during our feasibility studies, market survey, and also some of the assumptions readily available in the field. Below are the sales projections that we were able to come up with for the first three years of operations;

First Year-: $2,400,000

Second Year-: $3,000,000

Third Year-: $3,600,000

This projection is done based on what is obtainable in the industry and with the assumption that there won't be any major economic meltdown or natural disasters within the period stated above. Please note that the above projection might be lower, but may also be higher.

Start – Up Expenditure (Budget)

From research, it can be deduced that starting a recreational marijuana dispensary business isn't something that comes cheap, neither is it for those that are faint of heart. The first set of money to be spent just to make an application before entering this business is usually non-refundable, and is always in thousands of dollars.

The items listed below are the basics that we would need when starting our own recreational marijuana dispensary business in the United States, although costs might vary slightly;

- The Total Fee for Registering the Business in Massachusetts & Permits for Cannabis business – $35,000
- Legal expenses for obtaining licenses and permits – $10,000
- Marketing promotion expenses for the grand opening of Hadleaf in the amount of - $20,000
- Cost for hiring – $2,000
- Cost for Computer Software– $3,000
- Insurance coverage at a total premium – $15,000
- Cost for payment of rent for 12 month - $36,000
- Cost for Shop construction– $40,000
- Other start-up expenses including stationery $2,000 and phone and utility deposits $1,000
- Operational cost for the first 3 months (salaries of employees, payments of bills ect) – $80,000
- The cost for Start-up inventory (stocking with a wide range of products) – $60,000
- Storage hardware (bins, rack, shelves,) – $3,000
- The cost for counter area equipment– $1,000
- Cost for Supplies (Assorted bottles, boxes, envelopes, etc. for dispensing and shipment)- $1,500
- Cost for store equipment (cash register, security, ventilation, signage) – $6,000

- Cost of purchase and installation of CCTVs & security system: $25,000
- The cost for the purchase of furniture and gadgets (Computers, Printers, Telephone, TVs, tables and chairs et al): $8,000
- The cost of Launching a Website: $1,500
- The cost for external signage: $15,000
- Miscellaneous: $10,000

We would need an estimate of $375,000 to successfully set up our recreational marijuana dispensary store in Hadley, MA.

Please note that this amount includes the salaries of all of the staff for the first month of operation.

Generating Funding / Startup Capital for Hadleaf

Hadleaf is a privately held business that is solely owned and financed by Andrew Wielblad. He does not intend to welcome any external business partners which is why he has decided to restrict the sourcing of the startup capital from his personal savings.

Hadleaf Holistic Greens Dispensary LLC.

Plan for Obtaining Liability Insurance

The purpose of this plan is to outline how Hadleaf Holistic Greens Dispensary LLC. ("Company" or "Hadleaf") will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement.

Hadleaf has engaged with multiple insurance providers offering General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10). These providers are established in the legal marijuana industry. We are continuing these discussions with the insurance providers and will engage with the provider who best suits the needs of the Hadleaf once we receive a Provisional License.

As a result of such research, Hadleaf already secured a commercial general liability insurance policy with Lloyd's of London, through Canary Blomstrom Insurance Agency located in Feeding Hills, MA, in the amount of $1,000,000 for each occurrence, and $2,000,000 in general aggregate annually. Once Hadleaf receives its Provisional Marijuana Establishment License, Hadleaf will continue to maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, and will obtain product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually, with a deductible no higher than $5,000 per occurrence.

Hadleaf 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.

Hadleaf Holistic Greens Dispensary LLC.

Separating Recreational from Medical Operations

Hadleaf Holistic Greens Dispensary LLC. is only applying for a Marijuana Retailer license at this location. As such, plans to separate recreational from medical operations is inapplicable.

Hadleaf Holistic Greens Dispensary LLC.

Restricting Access to Age 21 and Older

Hadleaf Holistic Greens Dispensary LLC. (Hadleaf) will be compliant with all regulations outlined in 935 CMR 500.000 935 CMR 501.000 and 935 CMR 502.000 et. seq. and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission or any other regulatory agency.

Upon entry into the facility by an individual, a Hadleaf agent will immediately scan and inspect the individual's proof of identification to determine that the individual is 21 years of age or older. If the individual is under the age of 21 years of age, the individual shall not be admitted.

The Hadleaf Holistic Greens Dispensary LLC will only accept the following forms of proof of identification listed below, and authenticity of same shall be confirmed utilizing an Age Verification Smart ID scanner which will register fake IDs.

1. Massachusetts driver's license
2. Massachusetts Issued ID card
3. Out-of-state driver's license or state government issue ID card
4. Government issued passport
5. U.S. Military ID

Hadleaf will train all retail and security employees on the verification and identification of the age of individuals. This training will be done prior to employees performing age verification duties. Management will supply Age Verification Smart ID Scanners to assist in age verification.

All Hadleaf agents will enroll and complete the Responsible Vendor Training Program.

Hadleaf Personnel Policies & Background Checks

Hadleaf Holistic Greens Dispensary LLC (“Hadleaf”) shall implement the following Personnel Policies and Background Check policies:

(1) Hadleaf shall require that all personnel strictly adhere to, and comply with, all aspects of the Security Policy, which policy shall be incorporated herein by reference, specifically employee security policies, including personal safety and crime prevention.

(2) Hadleaf shall develop a staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);

(3) Hadleaf shall develop emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

(4) It shall be a policy of Hadleaf that the workplace shall be alcohol, smoke and drug-free;

(5) Hadleaf shall require that all personnel strictly adhere to, and comply with, all aspects of the Record Retention and Financial Record Maintenance and Retention policies, which policies shall be incorporated herein by reference, specifically regarding the maintenance of confidential information and other records required to be maintained confidentially;

(6) Hadleaf shall immediately dismiss any Marijuana Establishment agent who has:

a. Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;

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

c. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of Other Jurisdictions (as that term is defined in 935 CMR 500.002).

(7) Hadleaf shall apply for registration for all of its owners, employees, managers, and volunteers. All such individuals shall:

(a) be 21 years of age or older;

(b) not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions (as that term is defined in 935 CMR 500.002

(8) An application for registration of a marijuana establishment agent shall include:

(a) the full name, date of birth, and address of the individual;

(b) all aliases used previously or currently in use by the individual, including maiden name, if any;

(c) a copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;

(d) an attestation that the individual will not engage in the diversion of marijuana products;

(e) written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;

(f) background information, including, as applicable:

-. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002), whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

- a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002) relating to any professional or occupational or fraudulent practices;

- a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration,

- a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002) with regard to any professional license or registration held by the applicant

(9) Hadleaf shall notify the Commission no more than one (1) business day after a marijuana establishment agent ceases to be associated with Hadleaf. The subject agent's registration shall be immediately void when the agent is no longer associated with Hadleaf.

(10) Hadleaf shall require that all agents renew their registration cards annually from the date of issue, subject to a determination by the Commission that the agent continues to be suitable for registration.

(11) After obtaining a registration card for a marijuana establishment agent, Hadleaf shall notifying the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five (5) business days 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.

(12) Hadleaf's agents shall carry their registration card at all times while in possession of marijuana products, including at all times while at the Marijuana Establishment.

(13) Should any of Hadleaf's agents be affiliated with multiple Marijuana Establishments Hadleaf shall ensure that such agents are registered as a marijuana establishment agent by each Marijuana Establishment and shall be issued a registration card for each establishment.

(14) Hadleaf shall maintain, and keep up to date, an employee handbook that employees will be given copies of at the start of their employment and will be required to attest that they have read and received the same, covering a wide range of topics, including but not limited to:

(1) Vacation and sick time;

(2) Work schedules;

(3) Confidentiality standards;

(4) Criminal background check standards

(5) Security and limited access areas;

(6) Employee identification and facility access;

(7) Personal safety and crime prevention techniques;

(8) Alcohol, drug, and smoke-free workplace;

(9) Grounds for discipline and termination.

Each Employee shall be required to review the handbook and attest to their understanding and receipt of the same. Hadleaf will review its employee handbook periodically and communicate any changes to its employees.

Hadleaf shall maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position

2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment.

Maintaining of Financial Records

Hadleaf Holistic Greens Dispensary LLC (“Hadleaf”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all financial records required in any section of 935 CMR 500.000: Adult Use of Marijuana, and business records, in accordance with 935 CMR 500.105(e), which shall include manual or computerized records of:

1. Assets and liabilities;

2. Monetary transactions;

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

4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment, if any.

Furthermore, consistent with the Company’s Dispensing Policy, Hadleaf shall implement the following policies for Recording Sales

(a) Hadleaf shall utilize a point-of-sale (“POS”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“DOR”).

(b) Hadleaf shall not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.

(c) Hadleaf shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Hadleaf shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Hadleaf determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

i. it shall immediately disclose the information to the Commission;

ii. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data;

iii. take such other action directed by the Commission to comply with 935 CMR 500.105.

(e) Hadleaf shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

(f) Hadleaf shall adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.

(g) Hadleaf shall allow the Commission and the DOR audit and examine the POS system used by a retailer in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000: Adult Use of Marijuana;

Following closure of a Marijuana Establishment, Hadleaf shall keep all records for at least two years at the Company's expense and in a form and location acceptable to the Commission.

Record Keeping Procedures

Hadleaf Holistic Greens Dispensary LLC ("Hadleaf") shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all records required in any section of 935 CMR 500.000: Adult Use of Marijuana, in addition to the following:

1. Written operating procedures as required by 935 CMR 500.105(1);

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

3. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);

4. Personnel records as described in the Company's Personnel and Background Check Policy. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:

i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);

ii. Documentation of verification of references;

iii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision

iv. 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;

v. Documentation of periodic performance evaluations;

vi. A record of any disciplinary action taken; and

vii. Notice of completed responsible vendor and related duty training.

5. Business records which shall include manual or computerized records of the following:

(a) assets and liabilities;

(b) monetary transactions;

(c) books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

(d) sales records including the quantity, form, and cost of marijuana products; and

(e) salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment

6. Waste disposal records as required under 935 CMR 500.105(12), including but not limited to, a written or electronic record of the date, the type and quantity of marijuana, marijuana products or waste disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two (2) Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Hadleaf shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission. All Confidential Information (as that term is defined in 935 CMR 500.002 shall be maintained confidentially including secured or protected storage (whether electronically or in hard copy), and accessible only to the minimum number of specifically authorized employees essential for efficient operation and retention of such records. In any event, Hadleaf shall be authorized to disclose such confidential information as may be required by law. Following closure of a Marijuana Establishment, Hadleaf shall keep all records for at least two (2) years at the Company's expense and in a form and location acceptable to the Commission. It shall be a policy of Hadleaf that any and all records subject to any enforcement action shall be retained for the

duration of such action, or as otherwise extended by order of the Commission.

Energy Compliance Plan

Hadleaf Holistic Greens Dispensary LLC. ("Hadleaf") shall meet all applicable laws and regulations related to energy consumption, including electricity usage, water quality and consumption, solid and hazardous waste management, air pollution control and the like. Hadleaf shall enact protocols to reduce energy demands; engagement with energy efficiency programs offered by the state and/or municipality, and shall continuously explore all opportunities to reduce Hadleaf's energy consumption offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. Hadleaf's facility shall meet or exceed all state and local building code requirements.

Hadleaf shall comply with all energy efficiency standards and reporting requirements as promulgated by the Commission, the state, and any and all other governing bodies. Hadleaf shall explore utilizing natural light and energy efficient lighting for all lighting needs. Hadleaf shall monitor energy consumption and make adjustments to energy operates based on energy usage data and shall make energy reports available to the Commission. In the event equipment fails or needs to be replaced, Hadleaf shall seek opportunities to replace said equipment with energy efficient products as may be available.

Hadleaf shall explore utilizing renewable energy sources, if possible and available to Hadleaf at its current location.

Hadleaf Holistic Greens Dispensary LLC.

Quality Control and Testing

Hadleaf Holistic Greens Dispensary LLC. ("Hadleaf") shall only sell or market marijuana products that are tested for contaminants as required by the Commissions. Hadleaf maintain the results of all testing for a period of at least one year. Hadleaf is not cultivating or producing products at this time, and all products shall be obtained from facilities licensed by the Commission and in compliance with the Commission's rules and regulations governing quality control and testing of marijuana products. Hadleaf will ensure the following:

- All agents whose job includes contact with marijuana meet the requirements for food handlers specified in 105 CMR 300.00

- Any agent working in direct contact with marijuana will conform to sanitary practices while on duty, including:

  - Maintaining adequate personal cleanliness; and
  - Washing hands appropriately.

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

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

- Litter and waste will be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests.

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

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

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

- Water supply will be sufficient for necessary operations.

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

- Hadleaf Holistic Greens Dispensary will provide our employees with adequate, readily accessible toilet facilities.

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

Hadleaf Holistic Greens Dispensary LLC.

- No marijuana will be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratory.

- Hadleaf will notify the Cannabis Control Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary.

Hadleaf Employee Qualifications and Training

Hadleaf Holistic Greens Dispensary LLC (the "Company" or "Hadleaf") shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum shall include a four (4) hour Responsible Vendor Program under 935 CMR 500.105(2)(b) and a minimum of eight (8) hours on going training annually.

Hadleaf Holistic Greens Dispensary LLC anticipates on hiring for the following positions:

1. **General Manager: Qualifications**
    a. **Must have at least 2 years of general manager experience & 5 years in retail**
    b. **Must have organization and planning skills**
    c. **Must pass a background check**
    d. **Must have demonstrated a passion to serving the cannabis community**
    e. **Must have experience in hiring and training of staff**
    f. **At least 21 years of age**
    g. **Proven ability to manage teams effectively**
    h. **Excellent communication and customer service skills**
    i. **Understanding of accounting principles and ability to interpret financial data**
    j. **Computer operating skills**
    k. **Must not have been convicted of any felony offense**
    l. **Experience in analyzing financial reports**
    m. **Experience in a complex, fast -paced environment**
    n. **Supervisory and team-building skills**
    o. **Working knowledge of business processes and system development**
    p. **Ability to communicate clearly and concisely, both orally and in writing**
    q. **Ability to pass all required background checks to work with cannabis**

r. **Bachelor's degree**

2. **Assistant manager: Qualifications**
    a. **Must have at least 1 year of manager experience & 3 years in retail**
    b. **Must have organization and planning skills**
    c. **Must pass a background check**
    d. **Must have demonstrated a passion to serving the cannabis community**
    e. **Must have experience in hiring and training of staff**
    f. **At least 21 years of age**
    g. **Proven ability to manage teams effectively**
    h. **Excellent communication and customer service skills**
    i. **Understanding of accounting principles and ability to interpret financial data**
    j. **Computer operating skills**
    k. **Must not have been convicted of any felony offense**
    l. **Experience in analyzing financial reports**
    m. **Experience in a complex, fast -paced environment**
    n. **Supervisory and team-building skills**
    o. **Working knowledge of business processes and system development**
    p. **Ability to communicate clearly and concisely, both orally and in writing**
    q. **Ability to pass all required background checks to work with cannabis**
    r. **Bachelor's degree**

3. **Security Manager: Qualifications**
    a. **Must have at least 2 years of security management experience & 5 years in the security field**
    b. **Must have organization and planning skills**
    c. **Must pass a background check**
    d. **Must have demonstrated a passion to serving the cannabis community**

e. **Must have experience in hiring and training of staff**
f. **At least 21 years of age**
g. **Proven ability to manage teams effectively**
h. **Excellent communication and customer service skills**
i. **Computer operating skills**
j. **Must not have been convicted of any felony offense**
k. **Experience in a complex, fast -paced environment**
l. **Supervisory and team-building skills**
m. **Ability to communicate clearly and concisely, both orally and in writing**
n. **Ability to pass all required background checks to work with cannabis**
o. **Must have extensive knowledge of security systems**
p. **Must have experience in creating and editing security procedures**

4. **Compliance Manager: Qualifications**
    a. **Must have at least 3 year of business management experience**
    b. **Must have organization and planning skills**
    c. **Must pass a background check**
    d. **Must have demonstrated a passion to serving the cannabis community**
    e. **Must have experience in training of staff**
    f. **At least 21 years of age**
    g. **Proven ability to manage teams effectively**
    h. **Excellent communication and customer service skills**
    i. **Understanding of accounting principles and ability to interpret financial data**
    j. **Computer operating skills**
    k. **Must not have been convicted of any felony offense**
    l. **Experience in analyzing financial reports**
    m. **Experience in a complex, fast -paced environment**
    n. **Working knowledge of business processes and system development**

o. **Ability to communicate clearly and concisely, both orally and in writing**
p. **Ability to pass all required background checks to work with cannabis**
q. **Must have experience with financial tracking and Quickbooks**
r. **Must have extensive attention to detail**
s. **Highschool diploma or GED**

5. **Inventory Manager: Qualifications**
    a. **Must have at least 2 years of inventory manager experience & 5 years in retail**
    b. **Must have organization and planning skills**
    c. **Must pass a background check**
    d. **Must have demonstrated a passion to serving the cannabis community**
    e. **At least 21 years of age**
    f. **Proven ability to manage teams effectively**
    g. **Excellent communication and customer service skills**
    h. **Computer operating skills**
    i. **Must not have been convicted of any felony offense**
    j. **Experience in a complex, fast -paced environment**
    k. **Supervisory skills**
    l. **Ability to communicate clearly and concisely, both orally and in writing**
    m. **Ability to pass all required background checks to work with cannabis**
    n. **Highschool diploma or GED**

6. **Security Guards: Qualifications**
    a. **Must have at least 1 year of security experience**
    b. **Must pass a background check**
    c. **Must have demonstrated a passion to serving the cannabis community**
    d. **At least 21 years of age**
    e. **Excellent communication and customer service skills**

f. **Computer operating skills**
g. **Must not have been convicted of any felony offense**
h. **Experience in a complex, fast -paced environment**
i. **Ability to communicate clearly and concisely, both orally and in writing**
j. **Ability to pass all required background checks to work with cannabis**
k. **Highschool diploma or GED**
l. **Must have the ability to calmly deescalate situations**

7. **Budtender: Qualifications**

a. **Must pass a background check**
b. **Must have demonstrated a passion to serving the cannabis community**
c. **At least 21 years of age**
d. **Excellent communication and customer service skills**
e. **Computer operating skills**
f. **Must not have been convicted of any felony offense**
g. **Ability to communicate clearly and concisely, both orally and in writing**
h. **Ability to pass all required background checks to work with cannabis**
i. **Highschool diploma or GED**
j. **Positive attitude and desire to part of a team**

Company Training Policies shall be as follows:

1. All owners, managers and employees of the Company that are involved in the handling and sale of marijuana for adult **use will attend and successfully complete the Responsible Vendor Program within 90 days of being hired. In addition to receiving a minimum of eight (8) hours on going training annually.**

2. All new employees involved in the handling and sale of marijuana for adult use **will attend and successfully complete the Responsible Vendor Program with in 90 days of being hired. In addition to receiving a minimum of eight (8) hours on going training annually.**

3. It shall be a policy of the Company that after initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."

4. Administrative employees who do not handle or sell marijuana may take the responsible vendor training program on a voluntary basis.

5. The Company shall maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

The Company shall ensure that such responsible vendor training programs core curriculum include the following:

(a) Discussion concerning marijuana's effect on the human body. Training shall include:

a. Scientifically based evidence on the physical and mental health effects based on the type of marijuana product;

b. The amount of time to feel impairment;

c. Visible signs of impairment; and

d. Recognizing the signs of impairment.

(b) Diversion prevention and prevention of sales to minors, including best practices;

(c) Compliance with all tracking requirements; and

(d) Acceptable forms of identification.

Training shall include:

a. How to check identification;

b. Spotting false identification;

c. Provisions for confiscating fraudulent identifications; and

d. Common mistakes made in verification.

(e) Other key state laws and rules affecting owners, managers, and employees, which shall include:

a. Local and state licensing and enforcement;

b. Incident and notification requirements;

c. Administrative and criminal liability;

d. License sanctions;

e. Waste disposal;

f. Health and safety standards;

g. Permitting inspections by state and local licensing and enforcement authorities;

h. Licensee responsibilities for activities occurring within licensed premises;

i. Maintenance of records;

j. Prohibited purchases and practices.

The Company shall also ensure that all of its employees, managers, and volunteers shall:

(a) be 21 years of age or older;

(b) not have 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

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

Hadleaf Diversity Plan

Hadleaf Holistic Greens Dispensary LLC (the "Company" or "Hadleaf") understands and appreciates the importance of diversity and as such is committed to actively working to ensure a diverse workplace is created and maintained with in our Company. It is a policy of Hadleaf to promote equity among minorities, women, veterans, people with disabilities, and L.G.B.T.Q + in the operation of our Retail Marijuana Establishment. To the extent permissible by law, the Company will make jobs available to minorities, women, veterans, people with disabilities, and L.G.B.T.Q +, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

To this end, the Company will deploy a plan for enhancing diversity and equity within the organization through a number of various outreach efforts. Specifically, as it relates to its own internal practices, the Company will implement the following policies in connection with its diversity plan:

Goals:

1. The Company endeavors to provide job opportunities to minorities, women, veterans, people with disabilities, and L.G.B.T.Q +. The Company shall seek parity in its work force based on the American Community Survey (ACS) 2010 U.S. Census. Workforce availability statistics for the Total Civilian Labor Force for Massachusetts are as follows:
   Women 48.8%
   Minorities 20.7%
   Persons with Disabilities 12%
   Veterans 7%.

   So our goal for each of the 5 demographics as a percentage of our total workforce would be as follows:
   - **60% Women**
   - **35% Minorities**
   - **15% veterans**
   - **10% persons with disabilities**
   - **15% LGBTQ+**

2. It shall be a goal of the Company to offer advancement to management and executive positions internally. This goal seeks to provide opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement. **Our goal would be as follows:**
   - **50% Women**
   - **25% Minorities**

- **15% veterans**
- **10% persons with disabilities**
- **10% LGBTQ+**

3. It shall be a goal of the Company to ensure that all of its employees receive training on diversity and sensitivity.

Programs:

To the extent reasonably practicable, the Company shall implement the following programs: In an effort to ensure it has the opportunity to interview, and hire a diverse staff. The Company will post monthly notices for two (2) months during the opening hiring process in the local newspaper of the Gazette and post monthly notices for two (2) months during the opening hiring process at the municipal offices in Hadley MA. The aforementioned notices will state that the Company is specifically looking for women, minorities, or persons with disabilities to work for the Company. The Company also intends to advertise its job openings through Indeed

In an effort to ensure the Company meets its goal of offering advancement to management and executive positions internally, the Company shall offer 100% of the Company's opportunities for advancement internally.

As described above it is a goal of the Company to seek parity in its workforce; accordingly, the Company will review with in the store managers & assistant managers every 3 months that the Company's progresses towards meeting those goals. The results of these reviews will be provided to the Commission upon request and for the Company's annual license renewal application.

The Company shall require that employees receive education on diversity, implicit biases and sensitivity within the first ninety (90) days of employment and once annually thereafter.

Measurements:

To the extent reasonably practicable and as allowed by law, the Company shall implement the following measurements:

a. Pursuant to 935 CMR 500.103(4)(a) the Company's managers shall prepare an annual report identifying the Company's efforts to encourage diversity in the workplace, in compliance with 935 CMR 500.101(c)(7)(k) and this Diversity Policy. Specifically, said report shall identify the demographics of its employee population including but not limited to identifying the gender, race, sexual orientation (i.e. L.G.B.T.Q +) and disabled status of its employees without identifying the employee specifically and to the extent each employee is willing to share such information.

Additionally, this report will include the following metrics:

i. Number of individuals from the target demographic groups who were hired and retained after the issuance of a license;

ii. Number of promotions for people falling into the target demographics since initial licensure and number of promotions offered;

iii. Number of jobs created since initial licensure;

iv. Number of job postings in publications or online with supporting documentation; and

v. Number and subject matter of internal trainings held on diversity, implicit biases and sensitivity and the number of employees in attendance.

The Company affirmatively states that:

1. It acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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

3. The Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.