



# Massachusetts Cannabis Control Commission

## Marijuana Product Manufacturer

### General Information:

License Number: MP282215  
Original Issued Date: 08/07/2024  
Issued Date: 08/07/2024  
Expiration Date: 08/07/2025

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Haze of Grafton, LLC

Phone Number: 508-454-5323 Email Address: colonelboothe@gmail.com

Business Address 1: 135 Westboro rd, UNITS 2,3,4 Business Address 2: UNITS 2,3,4

Business City: North Grafton Business State: MA Business Zip Code: 01536

Mailing Address 1: 135 Westboro rd Mailing Address 2:

Mailing City: North Grafton Mailing State: MA Mailing Zip Code: 01536

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business

## PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

## RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control:

100

Role: Owner / Partner

Other Role:

First Name: Colonel

Last Name: Boothe

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

**ENTITIES WITH DIRECT OR INDIRECT AUTHORITY**

No records found

**CLOSE ASSOCIATES AND MEMBERS**

No records found

**CAPITAL RESOURCES - INDIVIDUALS**

No records found

**CAPITAL RESOURCES - ENTITIES**

No records found

**BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES**

No records found

**DISCLOSURE OF INDIVIDUAL INTERESTS**

Individual 1

First Name: Colonel

Last Name: Boothe

Suffix:

Marijuana Establishment Name: Haze of Grafton

Business Type: Marijuana Retailer

Marijuana Establishment City: North Grafton

Marijuana Establishment State: MA

**MARIJUANA ESTABLISHMENT PROPERTY DETAILS**

Establishment Address 1: 135 Westboro rd

Establishment Address 2:

Establishment City: Grafton

Establishment Zip Code: 01536

Approximate square footage of the Establishment: 4400

How many abutters does this property have?: 16

Have all property abutters have 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	HCA Certification Form - Haze of Grafton - Simplicity Dispensary copy.pdf	pdf	658c98550f1a250008a20064	12/27/2023
Plan to Remain Compliant with Local Zoning	Haze of Grafton, LLC Plan to Remain Compliant with Local Zoning.pdf	pdf	658ca009fa86d00008c3d33c	12/27/2023
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	658ca418fa86d00008c3da04	12/27/2023
Community Outreach Meeting Documentation	Attachment B - 1.pdf	pdf	658ca4670f1a250008a20e93	12/27/2023
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	658ca48cfa86d00008c3da7f	12/27/2023
Community Outreach Meeting Documentation	Haze of Grafton Community Outreach Attestation Form.pdf	pdf	65b93f6d58452f0008a459df	01/30/2024

Community Outreach Meeting Attachment - C .pdf pdf 65ba7df958452f0008a592d8 01/31/2024  
Documentation

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.: \$

#### POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan to Positively Impact Disproportionately Harmed People v2.pdf	pdf	65ba7e6c58452f0008a5933f	01/31/2024

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role:  
First Name: Colonel Last Name: Boothe Suffix:  
RMD Association: RMD Owner  
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 Unemployment Assistance - Certificate of Good standing	Haze of Grafton - MA DOR UNEMPLOYMENT ATTESTATION.pdf	pdf	645bbe0923b8090008370f4b	05/10/2023
Articles of Organization	Haze Articles of Incorpor 7-2022.pdf	pdf	645bbebf9c23790008b88210	05/10/2023
Secretary of Commonwealth - Certificate of Good Standing	Haze of Grafton - Certificate of good standing - 12-23 20-Dec-2023 16-14-13.pdf	pdf	6592da740f1a250008a4bf75	01/01/2024
Department of Revenue - Certificate of Good standing	Haze of Grafton - DOR - Certificate of good standing.pdf	pdf	6592daf70f1a250008a4bf75	01/01/2024
Bylaws	BYLAWS Simplicity Dispensary.pdf	pdf	659301ef0f1a250008a4ce43	01/01/2024

No documents uploaded

Massachusetts Business Identification Number: 001532042  
Doing-Business-As Name: Simplicity Dispensary  
DBA Registration City: Grafton

## BUSINESS PLAN

### Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan to Obtain Liability Insurance - Haze of Grafton LLC .pdf	pdf	654bbfa756bf530007e2d87b	11/08/2023
Proposed Timeline	Timeline - Haze of Grafton LLC.pdf	pdf	654bc45a56bf530007e2e3d3	11/08/2023
Business Plan	Business Plan - Grafton.pdf	pdf	655cd843bc2d09000872e8c4	11/21/2023

## OPERATING POLICIES AND PROCEDURES

### Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Sample of unique identifying marks used for branding	Samples of unique identifying marks used for branding.pdf	pdf	655ce3b4a1260900088d2f55	11/21/2023
Separating recreational from medical operations, if applicable	Separating recreational from medical operations.pdf	pdf	655ce3dea1260900088d2fa2	11/21/2023
Security plan	Security plan.pdf	pdf	655ce4f6bc2d090008730bf1	11/21/2023
Quality control and testing	Quality control and testing.pdf	pdf	655ce5e3a1260900088d337a	11/21/2023
Personnel policies including background checks	Personnel policies including background checks.pdf	pdf	655ce61ebc2d090008730f0c	11/21/2023
Record Keeping procedures	Record Keeping procedures.pdf	pdf	655ce633bc2d090008730f3a	11/21/2023
Maintaining of financial records	Maintaining of financial records.pdf	pdf	655ce74dbc2d090008731249	11/21/2023
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	655ce7f1bc2d090008731390	11/21/2023
Safety Plan for Manufacturing	Safety Plan for Manufacturing.pdf	pdf	655ce82ca1260900088d3a45	11/21/2023
Plan to Obtain Marijuana	Plan for obtaining marijuana or marijuana product.pdf	pdf	655ce865bc2d0900087314db	11/21/2023
Types of products Manufactured.	Types of Products Manufactured.pdf	pdf	655ce86dbc2d090008731522	11/21/2023
Security plan	Security plan.pdf	pdf	659300d0fa86d00008c691ea	01/01/2024
Storage of marijuana	Storage of Marijuana.pdf	pdf	65930362fa86d00008c6932e	01/01/2024
Transportation of marijuana	Transportation of marijuana.pdf	pdf	659303bafa86d00008c6935e	01/01/2024
Inventory procedures	Inventory procedures.pdf	pdf	659304090f1a250008a4cf43	01/01/2024
Restricting Access to age 21 and older	Restricting Access to age 21 and older.pdf	pdf	659308ddfa86d00008c6949b	01/01/2024
Prevention of diversion	Prevention of diversion.pdf	pdf	659309b00f1a250008a4d116	01/01/2024
Qualifications and training	Qualifications and training.pdf	pdf	65930babfa86d00008c6962b	01/01/2024
Method used to produce products	Method used to produce products.pdf	pdf	65930d82fa86d00008c69793	01/01/2024
Diversity plan	DIVERSITY PLAN v2.pdf	pdf	65ba7f447252ab000884cbca	01/31/2024

## 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 - PRE FEBRUARY 27, 2024

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

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

# Host Community Agreement Certification Form

## Instructions

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

## Certification

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

1. Name of applicant:

2. Name of applicant’s authorized representative:

3. Signature of applicant’s authorized representative:

4. Name of municipality:

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



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

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

8. Host community agreement execution date:



# Haze of Grafton, LLC Plan to Remain Compliant with Local Zoning

Haze of Grafton, LLC will remain compliant at all times with the local zoning requirements set forth in the Grafton Zoning Bylaw. In accordance with Zoning Bylaw Chapter 40A, Haze of Grafton, LLCs proposed Marijuana Establishment (Marijuana Retailer, Marijuana Product Manufacturer) is located in the Business District designated for Marijuana Establishments.

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

Haze of Grafton, LLC will comply with all conditions and standards set forth in any local permit required to operate a Marijuana establishment in Grafton. Haze of Grafton, LLC has already attended several meetings with various municipal officials and boards to discuss Haze of Grafton, LLC's plans for a proposed Marijuana Establishment and has executed a Host Community Agreement with the town of Grafton. Haze of Grafton, LLC will continue to work cooperatively with various municipal departments, boards, and officials to ensure that Haze of Grafton, LLC's Marijuana Establishment (Marijuana Retailer, Marijuana Product Manufacturer) remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.



## CLASSIFIEDS

**PLACE YOUR AD:**  
[classifieds@thegrafftonnews.com](mailto:classifieds@thegrafftonnews.com)  
 Ad Deadline is Friday @ Noon

### PUBLIC NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Product Manufacturing and Cultivation is scheduled for January 4th at 6pm via Zoom. The link is: <https://tinyurl.com/HazeOfGrafton>

The proposed Marijuana Product Manufacturing and Cultivation establishment is anticipated to be located at 135 Westboro rd, North Grafton, MA, 01536. There will be an opportunity for the public to ask questions at the end of the Zoom meeting. Published in The Grafton News December 21, 2023.

1775880

### PUBLIC NOTICE

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

**SIMPLIFIED CHINESE**  
 844-313-3437  
 info@centralmassreliability.com.

Published in The Grafton News December 21, 2023.

1779250

### PUBLIC NOTICE

State CommBuys website under bid number BD-24-1274-TAOFF-TAOFF-96281.

All proposals must be received by Monday, January 17, 2024 at 10:00 a.m. All submitted proposals should be submitted to William Blake at 30 Providence Road, Grafton, MA 01519 in an envelope clearly marked "Cupola Restoration". No electronic submissions will be accepted.

The Select Board reserves the right to reject any bids in whole or in part, and to award the bid it deems to be in the best interest of the Town.

Published in The Grafton News December 21, 2023.

1782850

### PUBLIC NOTICE OF ENVIRONMENTAL REVIEW

**PROJECT:** National Grid Line 313/343/ O141/P142 ACR and Access Road Improvement Project

**LOCATION:** Ayer (01432), Shirley (01464), Lancaster (01523), Sterling (01564), West Boylston (01583), Boylston (01505), Shrewsbury (01545), Worcester (01608), Grafton (01519) and Millbury (01527)

**PROPOSER:** New England Power Company d/b/a National Grid

**The undersigned is submitting an Environmental Notification Form ("ENF") to the Secretary of Energy & Environmental Affairs on or before:** December 15, 2023

**This will initiate review of the above project pursuant to the Massachusetts Environmental Policy Act ("MEPA," M.G.L. c. 30, ss. 61-62L). Copies of the ENF may be obtained from:**

Name: Isabel Mohammadi-Hall  
 Email Address: [imohammadi-hall@trccompanies.com](mailto:imohammadi-hall@trccompanies.com)  
 Phone Number: (201) 306-2297

**Electronic copies of the ENF are also being sent to the Conservation Commission and Planning Board of Grafton**

The Secretary of Energy & Environmental Affairs will publish notice of the ENF in the Environmental Monitor, receive public comments on the project, and then decide if an Environmental Impact Report is required. A site visit and/or remote consultation session on the project may also be scheduled. All persons wishing to comment on the project, or to be notified of a site visit and/or remote consultation session, should email [MEPA@mass.gov](mailto:MEPA@mass.gov) or the MEPA analyst listed in the Environmental Monitor. Requests for language translation or other accommodations should be directed to the same email address. Mail correspondence should be directed to the Secretary of Energy & Environmental Affairs, 100 Cambridge St., Suite 900, Boston, Massachusetts 02114, Attention: MEPA Office, referencing the above project.

By: New England Power Company d/b/a National Grid

### SPANISH

Si desea que le traduzcan esto al español, comuníquese por teléfono al 844-313-3437 o escribanos un correo a [info@centralmassreliability.com](mailto:info@centralmassreliability.com).

### PORTUGUESE BRAZIL

Caso deseje que este conteúdo seja traduzido para o português do Brasil, entre em contato pelo número +1 (844) 313-3437 ou envie um e-mail para [info@centralmassreliability.com](mailto:info@centralmassreliability.com).

### PORTUGUESE CAPE VERDE

Se você desejar que isto seja traduzido para o crioulo cabo-verdiano, por favor entre em contato pelo 844-313-3437 ou e-mail para [info@centralmassreliability.com](mailto:info@centralmassreliability.com).

### LEGAL NOTICE

#### GRAFTON SELECT BOARD

The Select Board will hold a public hearing on the request of National Grid for permission to construct a line of underground electric conduits, including the necessary sustaining and protecting fixtures, under and across the following public way:

#### BRENDAN DRIVE

Brendan Dr – National Grid to install 1 new 50 KVA transformer (Pad 4-97) and approximately 200 feet of underground primary cable on Brendan Dr for a new service to 5 Brendan Dr.

The public hearing will be held on January 9, 2024 in Conference Room A of the Grafton Memorial Municipal Center located at 30 Providence Road and via Zoom starting at 7:00pm. The Zoom link will be posted on the January 9, 2024 Select Board agenda. The purpose of this hearing is to provide an opportunity for public comment. Anyone wishing to may attend in person or via Zoom.

#### GRAFTON SELECT BOARD

Published in The Grafton News December 21, 28, 2023.

1779260

#### INVITATION FOR BIDS HVAC UPGRADES TO STATION TWO, NORTH GRAFTON

The Town of Grafton is soliciting sealed bids for HVAC Upgrades at Station Two in North Grafton. This work includes the installation of a new heating system, the demolition of the existing heating system, and the installation of five (5) mini split units in personnel areas. As well as all piping, wiring, and necessary accessory work.

Documents are available upon request from William Blake, at [blakew@grafton-ma.gov](mailto:blakew@grafton-ma.gov). The bid posting can also be found on the State CommBuys website, under bid number BD-24-1274-TAOFF-TAOFF-96235.

All proposals must be received by Friday, January 5, 2024, at 10:00 a.m. All submitted proposals should be sent to William Blake at 30 Providence Road, Grafton, MA 01519 in an envelope clearly marked "HVAC Improvements".

The Select Board reserves the right to reject any bids in whole or in part, and to award the bid it deems to be in the best interest of the Town.

Published in The Grafton News December 21, 2023.

1779270

#### INVITATION FOR BIDS CUPOLA RESTORATION AT THE GRAFTON PUBLIC LIBRARY

The Town of Grafton is soliciting proposals for restoration work to a historic Cupola located at the Grafton Public Library. Work includes restorations to the cupola in accordance with drawings and specifications provided by the Town's contracted architect, work to a copper roof, and structural repairs inside the base of said cupola. This project is being partially funded through the Massachusetts Preservation Projects Fund.

Documents are available upon request from William Blake, at [blakew@grafton-ma.gov](mailto:blakew@grafton-ma.gov). This bid posting can also be found on the



Getty Images

## GRAFTON POLICE LOG

**Sunday, December 3**  
 7:18 a.m. Disabled auto, Providence Road, services rendered  
 7:40 a.m. Burglar alarm, Providence Rd., investigated  
 9:39 a.m. Suspicious auto, Keith Hill Rd., investigated  
 2:23 p.m. Well-being check, Pleasant St., area search negative  
 4:49 p.m. Burglar alarm, Providence Rd., accidental/defective alarm  
 6:25 p.m. Accident, no injuries, investigated  
 8:43 p.m. Erratic operator, Mass Pike E., referred to state police  
 9:27 p.m. Automated alarm, water department, Worcester St., referred to water department

**Monday, December 4**  
 8:14 a.m. Road hazard, Worcester St., referred to DPW  
 8:20 a.m. Accident, property damage, Westboro Rd., investigated  
 1:05 p.m. Suspicious auto, Main St., area search negative  
 1:38 p.m. Suspicious activity, Main St., services rendered  
 3:08 p.m. Scam/attempted scam, Ferry St., info recorded  
 3:26 p.m. Well-being check, Forest Lane, investigated  
 4:33 p.m. Missing/lost person, Aspen Ave., investigated  
 5:59 p.m. Accident-no injuries, Maplewood Dr., Deernolm St., investigated  
 6:13 p.m. Motor vehicle stolen, Worcester St., area search negative  
 8:03 p.m. Disabled auto, Audrina Lane, services rendered  
 8:21 p.m. Burglar alarm, Worcester St., accidental/defective alarm

**Tuesday, December 5**  
 3:56 a.m. Burglar alarm, Worcester St., accidental/defective alarm  
 6:26 a.m. Illegal dumping, Milford Rd. and Bigelow Way, referred to DPW  
 8:29 a.m. Animal complaint, Worcester St., referred to animal control  
 12:51 p.m. Harassment, Providence Rd., investigated  
 4:07 p.m. Suspicious activity, Hovey Pond Dr., info recorded  
 8:31 p.m. Remove unwanted party, Orchard St., services rendered  
 11:26 p.m. Suspicious auto, High Point Dr., services rendered

**Wednesday, December 7**  
 1:26 a.m. Motor vehicle stop, Worcester St., arrest: speed exceeding posted limit, operating a motor vehicle with suspended license  
 6:28 a.m. Suspicious activity, Magill Dr., no service required  
 8:21 a.m. Suspicious auto, Suzanne Terr., services rendered  
 8:55 a.m. Accident, no injuries, Worcester St., investigated  
 11:47 a.m. Suspicious person, Worcester St., investigated  
 12:02 p.m. Animal complaint, Brigham Hill Rd. and Hudson Ave., area search negative  
 1:18 p.m. Traffic hazard, Shrewsbury St. and Prentice St., unfounded  
 4:47 p.m. Erratic operation, Worcester St. and N. Main St., area search negative  
 4:55 p.m. Motor vehicle violation, Worcester St., arrest: operating a motor vehicle with license suspended; uninsured motor vehicle; unregistered motor vehicle; number plate violation; unlicensed operation of a motor vehicle  
 5:14 p.m. Suspicious activity, Perry St., area search negative  
 5:21 p.m. Burglar alarm, Worcester St., accidental/defective  
 5:32 p.m. Harassment, Elmwood St., info recorded  
 5:49 p.m. Disabled auto, Worcester St., investigated

6:57 p.m. Traffic hazard, N. Main St. and Worcester St., info recorded  
 9:00 p.m. Burglar alarm, Airport Rd., accidental defective alarm

**Thursday, December 7**  
 2:01 a.m. Suspicious auto, Bay Farm Lane, investigated  
 7:54 a.m. Accident, rollover/entrapment, Main St. and Pleasant St., removed to hospital  
 12:55 p.m. Well-being check, Pine St., area search negative  
 3:51 p.m. Well-being check, Snow Rd., removed to hospital  
 11:56 p.m. Animal complaint, North St., services rendered

**Friday, December 8**  
 5:23 a.m. Erratic operator, Upton St., arrest: operating a motor vehicle with license suspended; failure to maintain marked lanes; speed exceeding posted limit  
 7:39 a.m. Illegal dumping, Millbury St. and Hudson Ave., investigated  
 7:54 a.m. Well-being check, Snow Rd., services rendered  
 8:59 a.m. Wires down, Adams Rd., investigated  
 10:19 a.m. Erratic operator, Main St., services rendered  
 10:52 a.m. Lost or found article, Brigham Hill Rd., no service required  
 2:03 p.m. Accident, no injuries, Providence Rd., investigated  
 2:42 p.m. Custody dispute, Mian St., referred to other agency  
 3:57 p.m. Fraud/identity theft, Providence Rd., investigated  
 5:00 p.m. Accident, no injuries, Millbury St. and Providence Rd., investigated  
 9:16 p.m. Threatening, Forest Lane, services rendered

**Saturday, December 9**  
 12:18 a.m. Suspicious auto, Providence Rd., investigated  
 6:23 a.m. Accident, no injuries, Worcester St., services rendered  
 6:35 a.m. Accident, rollover/entrapment, Brigham Hill Rd., removed to hospital  
 10:58 a.m. Fraud/identity theft, Providence Rd., services rendered  
 11:09 a.m. Traffic hazard, Beth Lee Dr., services rendered  
 12:19 a.m. Well-being check, Hovey Pond Dr., patient refusal  
 2:17 p.m. Accident, personal injury, Mass Pike E, investigated  
 2:17 a.m. Accident, no injuries, Leland Hill Rd. and N. Main St., investigated  
 2:32 p.m. Fraud/identity theft, Providence Rd., investigated  
 4:09 p.m. Well-being check, N. Main St., investigated  
 4:59 p.m. Disturbance-general, North St., arrest  
 6:04 p.m. Lost or found article, Meadowbrook Rd., area search negative  
 8:53 p.m. Disturbance-general, Worcester St., area search negative  
 9:02 p.m. Suspicious auto, Brigham Hill Rd., area search negative  
 10:31 p.m. Well-being check, Institute Rd., investigated  
 11:41 p.m. Suspicious auto, Pullard Rd., area search negative

*Grafton Police responded to 69 motor vehicles citations/warnings/investigations, 9 medical calls and 17 fire assists, that were not otherwise mentioned in this log.*

*These logs are only a snapshot of the calls logged by the Grafton Police Department; routine area, school and business checks, traffic enforcement duties, court appearances, prisoner transports, follow-up investigations, BOLOs, assistance to other police departments and 911 misdials to which police presence was not necessary have been left out due to space considerations.*

## WAYNE GRENIER

### LICENSED ELECTRICIAN

*"A Homeowner's Electrician"*



Fully Insured  
 Mass. Lic. # E40328

**Call at 508-234-4237**

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 More than 25 Years Experience

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cars  
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antiques  
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computers  
boats  
sports equipment  
pets  
instruments  
jewelry  
furniture  
tablets  
auctions  
yard sales  
collectibles  
appliances  
cameras  
coins

Place your classified ad today.

## Too Much Stuff? Place An Ad For A Garage Sale!



**Fwd: Legal Notice**

**From** Colonel Boothe <colonelboothe@gmail.com>  
**To** ykir@simplicitydispensary.com <ykir@simplicitydispensary.com>  
**Date** 2023-12-20 15:45

# ATTACHMENT B

Get [Outlook for Android](#)

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**From:** Kandy Lavallee <lavalleek@Grafton-MA.Gov>  
**Sent:** Wednesday, December 20, 2023 3:39:02 PM  
**To:** cboothe@simplicitydispensary.com <cboothe@simplicitydispensary.com>  
**Subject:** Legal Notice

Hello,  
Your notice has been posted. Have a great night!  
Kandy

**Kandy L. Lavallee CMC, CMMC**

Town Clerk  
Public Records Access Officer  
Notary Public  
Town of Grafton  
508-839-5335 x1302  
lavalleek@grafton-ma.gov  
Website: [Grafton-ma.gov](http://Grafton-ma.gov)  
Facebook: [Town of Grafton, MA](#)  
Twitter: [@TownofGraftonMA](#)

**MUNICIPAL CENTER HOURS**

Monday, Wednesday, Thursday: 8:30 - 4:30  
Tuesday: 8:30 - 7:00  
Friday: 8:30 - 1:00

## Online Form Submittal: Contact Kandy Lavallee

**ATTACHMENT B**

**From** <noreply@civicplus.com>  
**To** <ykir@simplicitydispensary.com>  
**Date** 2023-12-20 08:30

## Contact Kandy Lavallee

Your name	Colonel Boothe
Your email address	cboothe@simplicitydispensary.com
Subject	Community Outreach Meeting for Proposed Marijuana Product Manufacturing and Cultivation Facility - January 4th, 6pm via Zoom
Message	Dear Kandy,

I trust this message finds you well. I would like to kindly request the prompt addition of an important notice to the Town website. Your assistance in this matter is highly appreciated.

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Product Manufacturing and Cultivation is scheduled for January 4th at 6pm via Zoom. The link is:

<https://tinyurl.com/HazeOfGrafton>

The proposed Marijuana Product Manufacturing and Cultivation establishment is anticipated to be located at 135 Westboro rd, North Grafton, MA, 01536. There will be an opportunity for the public to ask questions at the end of the Zoom meeting.

This meeting is of significant importance, and the active participation of our community is encouraged.

Additionally, please find attached the receipt from Grafton News confirming the publication.

Your attention to this matter is greatly appreciated, and I would like to express my gratitude in advance for your prompt response.

Best regards,  
Colonel Boothe

Attachment 1	90d1-f6917a5a2b1c9-27acbabc7-bba4-713579615-a2d1-13517881a-ab10-0164cadf2-3ece-c66e1fa12c3bd-50ac-c7ba841b1-dd79846a6.pdf
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Attachment 2	<i>Field not completed.</i>
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Attachment 3	<i>Field not completed.</i>
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# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

1. The Community Outreach Meeting was held on the following date(s):
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

b. Name of publication:

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

a. Date notice filed:

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

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:

- a. The type(s) of ME or MTC to be located at the proposed address;
- b. Information adequate to demonstrate that the location will be maintained securely;
- c. Steps to be taken by the ME or MTC to prevent diversion to minors;
- d. A plan by the ME or MTC to positively impact the community; and
- e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

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



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



[Redacted]  
[Redacted] MA 01536

BERNARDES, LUIZMAR  
BERNARDES, JAYNE SILVA  
137 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
31 WHEELER ROAD  
N GRAFTON, MA 01536

[Redacted]  
1 ASHBURTON PLACE RM 1610  
BOSTON, MA 02108

[Redacted]  
131 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
104 OTIS STREET SUITE 27  
NORTHBOROUGH, MA 01532

[Redacted]  
31 WHEELER ROAD  
N GRAFTON, MA 01536

[Redacted]  
135 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
55 GLENLAKE PARKWAY, NE  
ATLANTA, GA 30328

[Redacted]  
99 HIGH STREET, 11TH FLOOR  
BOSTON, MA 02110

[Redacted]  
121 WESTBORO ROAD  
N GRAFTON, MA 01536

ATTACHMENT C

[Redacted]  
135 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
1 ASHBURTON PLACE RM 1610  
BOSTON, MA 02108

[Redacted]  
121 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
31 WHEELER ROAD  
N GRAFTON, MA 01536

[Redacted]  
31 WHEELER ROAD  
N GRAFTON, MA 01536

[Redacted]  
99 HIGH STREET, 11TH FLOOR  
BOSTON, MA 02110

[Redacted]  
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NORTHBOROUGH, MA 01532

[Redacted]  
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N GRAFTON, MA 01536

[Redacted]  
55 GLENLAKE PARKWAY, NE  
ATLANTA, GA 30328

[Redacted]  
131 WESTBORO ROAD  
N GRAFTON, MA 01536

[Redacted]  
GRAFTON, MA 01536

RECEIVED

DEC 11 2023

GRAFTON  
ASSESSORS



**TOWN OF GRAFTON**  
GRAFTON MEMORIAL MUNICIPAL CENTER  
30 PROVIDENCE ROAD  
GRAFTON, MASSACHUSETTS 01519  
508-839-5335 ext 1165 • FAX 508-839-4602  
www.grafton-ma.gov

BOARD OF ASSESSORS

## Request for Abutters List

Date of Request: 12/11/2023 Date List Needed: \_\_\_\_\_  
Requested by: Colonel Brothe Phone: 508-454-5323  
Name of Property Owner: CBTA Holdings LLC  
Street Address of Property: 135 Westboro rd, North Grafton  
Map: 13 Block: 0 Lot: 2

### REASON FOR LIST:

Hearing before Zoning Board of Appeals Yes \_\_\_\_\_ No \_\_\_\_\_  
Hearing before Planning Board Yes \_\_\_\_\_ No \_\_\_\_\_  
Hearing before Conservation Commission Yes \_\_\_\_\_ No \_\_\_\_\_

Other: Community Outreach Meeting

### REASON FOR HEARING - (please check one)

Variance \_\_\_\_\_ Scenic Road \_\_\_\_\_ Title 5 \_\_\_\_\_ Special Permit \_\_\_\_\_ Subdivision \_\_\_\_\_

Other: \_\_\_\_\_

### RADIUS FOR ABUTTERS - (please check one)

100 Feet \_\_\_\_\_ 300 Feet  Immediate \_\_\_\_\_ Upon, along, across or under \_\_\_\_\_

### LABELS

Two (2) Sets of Labels are provided with abutters lists unless otherwise specified.

Other: \_\_\_\_\_ set(s) needed.

### Office Use Only

Date List Prepared: 12/14/23 Address Labels Prepared: 12/14/23  
Fee Charged: \$ 25.00 Amt. Paid: \$ 25- Date: 12-18-23  
Check: # 90 Cash: \$ \_\_\_\_\_ Money Order: \$ \_\_\_\_\_

# **Plan to Positively Impact Disproportionately Harmed People**

## **Overview:**

Haze of Grafton, LLC (“Haze of Grafton” or the “Company”) is committed to serving and supporting populations and communities falling within Areas of Disproportionate Impact (ADI) in the City of Worcester. The Company has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) to establish specific goals and programs for carrying out this commitment.

**Goal 1:** Creating a brand incubator program named "Social Empowerment Collective" to foster entrepreneurship and economic empowerment. By helping Social Equity and Economic Empowerment designated individuals launch a cannabis product brand.

## **Programs:**

1. Conduct workshops on essential business skills, cannabis industry knowledge, and sustainable entrepreneurship practices as part of the Brand Incubator Program - “Social Empowerment Collective”. Commit to launching 2 brands per year and contributing 100 hours of resources and time to each brand at no cost.
2. Connect entrepreneurs from underprivileged areas with experienced mentors in the cannabis industry for guidance, advice, and networking opportunities, integrated into the Brand Incubator Program.

## **Measurements:**

1. Track the number of successfully incubated brands within the Social Empowerment Collective.
2. Evaluate the economic impact of businesses in terms of revenue generated.

**Goal 2:** Priority hiring of individuals from Commission-designated ADI in the City of Worcester (Census Tracts 7302, 7305, 7310.02, 7312.03, 7312.04, 7313, 7314, 7315, 7317, 7318, 7323.02, 7324, 7327 and 7330) and Massachusetts residents with past drug convictions, with the specific goals of having:

- at least 25% of all employees at the Haze of Grafton, LLC be present or past residents of the Commission-designated Census Tracts in Worcester listed above;

**Programs:**

1. Implement training programs to equip employees from ADI areas and those with past drug convictions with the necessary skills for various roles within the cannabis industry.
2. Partner with reentry programs and organizations to create pathways for individuals with past drug convictions to reenter the workforce successfully.
3. Advertising employment opportunities in the Worcester Telegram & Gazette using advertisements that encourage past or present residents of ADI in the City of Worcester and Massachusetts residents with past drug convictions to apply.

**Measurements:**

1. Conducting, no less than annually, employment composition reviews to determine:
  - What percentage of employees at the Haze of Grafton, LLC live or have lived in a Commission Designated ADI in the City of Worcester (identified by voluntary employment questionnaires), and Haze of Grafton, LLC
  - What percentage of employees at the Haze of Grafton, LLC have past drug convictions (identified by voluntary employment questionnaires);
2. Retention Rates: Monitor the retention rates of employees from ADI areas and those with past drug convictions to ensure a supportive and inclusive work environment.
3. Employee Feedback: Collect feedback from employees to assess their satisfaction, engagement, and perceived impact of the company's hiring initiatives.

Haze of Grafton, LLC acknowledges, is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations

on ownership or control or other applicable state laws. Finally, none of the actions taken or programs instituted by Haze of Grafton will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.



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

Minimum Fee: \$100.00

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

**Restated Certificate of Organization**

(General Laws, Chapter )

Identification Number: 001532042

The date of filing of the original certificate of organization: 9/20/2021

1. The exact name of the limited liability company is: HAZE OF GRAFTON, LLC  
 and if changed, the name under which it was originally organized:

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

No. and Street: 135 WESTBORO RD  
 City or Town: NORTH GRAFTON State: MA Zip: 01536 Country: USA

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

No. and Street: 135 WESTBORO RD  
 City or Town: NORTH GRAFTON State: MA Zip: 01536 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:

LLC IS ORGANIZING IN ORDER TO APPLY FOR A LICENSE WITH THE CCC

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

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

Name: COLONEL BOOTHE  
 No. and Street: 26 GREENBUSH RD  
 City or Town: WORCESTER State: MA Zip: 01604 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	COLONEL BOOTHE	26 GREENBUSH RD WORCESTER, MA 01604 USA

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

Title	Individual Name	Address (no PO Box)
-------	-----------------	---------------------

First, Middle, Last, Suffix

Address, City or Town, State, Zip Code

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

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	COLONEL BOOTHE	26 GREENBUSH RD WORCESTER, MA 01604 USA

**9. Additional matters:**

**10. Describe any amendments to be effected by the restated certificate, and if none, include a statement to that affect:**

CHANGE OF PRINCIPAL OFFICE ADDRESS

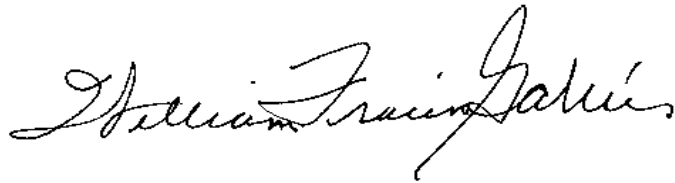
**11. The restated certificate shall be effective when filed unless a later effective date is specified:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 6 Day of July, 2022,  
COLONEL BOOTHE , Signature of Applicant.**

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:

July 06, 2022 12:53 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

William Francis Galvin  
Secretary of the  
Commonwealth

December 5, 2023

TO WHOM IT MAY CONCERN:

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

**HAZE OF GRAFTON, LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **September 20, 2021**.

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

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

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

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

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





## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



HAZE OF GRAFTON, LLC  
135 WESTBORO RD UNIT 2  
NORTH GRAFTON MA 01536-1809

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

The Commissioner of Revenue certifies that, as of the date of this certificate, HAZE OF GRAFTON, 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](https://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

## BY-LAWS

### **Haze of Grafton, LLC d/b/a Simplicity Dispensary**

#### ARTICLE I — NAME AND PURPOSE

*Section 1 — Name:* The name of the organization shall be **Haze of Grafton, LLC d/b/a Simplicity Dispensary**. It shall be a for-profit organization incorporated under the laws of the State of Massachusetts

*Section 2 — Purpose:* **Haze of Grafton, LLC** is organized exclusively for marijuana retail and wholesale operations.

#### **The purpose of this corporation is:**

- To sell legally acquired marijuana products and the manufacturing of marijuana products.

#### ARTICLE II — MEMBERSHIP

*Section 1 — Membership:* Membership shall consist of the board of directors.

#### ARTICLE III — BOARD OF DIRECTORS

*Section 1 — Board role, size, and compensation:* The board is responsible for overall policy and direction of the association, and delegates responsibility of day-to-day operations to the staff and committees. **The board shall have up to 5, but not fewer than 1 member.** The board receives compensation other than reasonable expenses. Currently the board consists of the company's sole owner Colonel Boothe.

*Section 2 — Terms:* All board members shall serve two-year terms, but are eligible for re-election for up to five consecutive terms.

*Section 3 — Meetings and notice:* The board shall meet at least yearly, at an agreed upon time and place. An official board meeting requires that each board member have written notice at least two weeks in advance.

*Section 4 — Board elections:* During the last quarter of each fiscal year of the corporation, the board of directors shall elect Directors to replace those whose terms will expire at the end of the fiscal year. This election shall take place during a regular meeting of the directors, called in accordance with the provisions of this operating agreement.

*Section 5 – Election procedures:* New directors shall be elected by a majority of directors present at such a meeting, provided there is a quorum present. Directors so elected shall serve a term beginning on the first day of the next fiscal year.

*Section 6 – Quorum:* A quorum must be attended by at least forty percent of board members for business transactions to take place and motions to pass.

*Section 7 – Officers and Duties:* There shall be four officers of the board, consisting of a chair, vice-chair, secretary and treasurer.

Their duties are as follows:

*The chair* shall convene regularly scheduled board meetings, shall preside or arrange for other members of the Executive Committee to preside at each meeting in the following order: vice-chair, secretary, treasurer.

*The vice-chair* shall chair committees on special subjects as designated by the board.

*The secretary* shall be responsible for keeping records of board actions, including overseeing the taking of minutes at all board meetings, sending out meeting announcements, distributing copies of minutes and the agenda to each board member, and assuring that corporate records are maintained.

*The treasurer* shall make a report at each board meeting. The treasurer shall chair the finance committee, assist in the preparation of the budget, help develop fundraising plans, and make financial information available to board members and the public.

*Section 8 – Vacancies:* When a vacancy on the board exists mid-term, the secretary must receive nominations for new members from present board members two weeks in advance of a board meeting. These nominations shall be sent out to board members with the regular board meeting announcement, to be voted upon at the next board meeting. These vacancies will be filled only to the end of the particular board member's term.

*Section 9 – Resignation, termination, and absences:* Resignation from the board must be in writing and received by the secretary. A board member shall be terminated from the board due to excess absences, more than two unexcused absences from board meetings in a year. A board member may be removed for other reasons by a three-fourths vote of the remaining directors.

*Section 10 – Special meetings:* Special meetings of the board shall be called upon the request of the chair, or one-third of the board. Notices of special meetings shall be

sent out by the secretary to each board member at least two weeks in advance.

#### ARTICLE IV — COMMITTEES

*Section 1 — Committee formation:* The board may create committees as needed. The board Chair appoints all committee chairs.

*Section 2 — Executive Committee:* The officers serve as the members of the Executive Committee. Except for the power to amend the articles of incorporation and operating agreement, the Executive Committee shall have all the powers and authority of the board of directors in the intervals between meetings of the board of directors, and is subject to the direction and control of the full board.

*Section 3 — Finance Committee:* The treasurer is the chair of the Finance Committee, which includes three other board members. The Finance Committee is responsible for developing and reviewing fiscal procedures, fundraising plan, and annual budget with staff and other board members. The board must approve the budget and all expenditures must be within budget. Any major change in the budget must be approved by the board or the Executive Committee. The fiscal year shall be the calendar year. Annual reports are required to be submitted to the board showing income, expenditures, and pending income. The financial records of the organization are public information and shall be made available to board members and the public.

#### ARTICLE V — DIRECTOR AND STAFF

*Section 1 — Executive Director:* The executive director has day-to-day responsibilities for the organization, including carrying out the organization's goals and policies. The executive director will attend all board meetings, report on the progress of the organization, answer questions of the board members and carry out the duties described in the job description. The board can designate other duties as necessary.

#### ARTICLE VI — AMENDMENTS

*Section 1 — Amendments:* This operating agreement may be amended when necessary by two-thirds majority of the board of directors. Proposed amendments must be submitted to the secretary to be sent out with regular board announcements.

SIMPLICITY



DISPENSARY

Haze of Grafton, LLC d/b/a Simplicity Dispensary  
135 Westboro rd, North Grafton, MA 01536

## **Plan to Obtain Liability Insurance**

- Haze of Grafton, LLC will obtain its insurance coverage through a cannabis insurance company.
- The general liability insurance coverage will be equal to or greater than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually and product liability insurance coverage for equal to or greater than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. The deduction is equal to or less than \$5,000 per occurrence.

S I M P L I C I T Y



D I S P E N S A R Y

**Haze of Grafton, LLC d/b/a Simplicity Dispensary  
Business Plan  
135 Westboro rd, North Grafton, MA, 01536**

# **I. Executive Summary**

## **1.1 Mission Statement**

Haze of Grafton, LLC (“Simplicity Dispensary”) is a Marijuana Establishment (“ME”) committed to creating a safe and clean community dispensary and product manufacturing facility that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

## **1.2 License Type**

Simplicity Dispensary is applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “Commission”) to operate a retail, cultivation and marijuana product manufacturing facility, in Massachusetts.

## **1.3 Product**

Simplicity Dispensary will offer a wide range of products and services that will allow us to serve customers with a wide variety of needs. Products Simplicity Dispensary intends to offer include, but will not be limited to:

1. Concentrates (Ethanol, BHO, and CO2 based extractions)
2. Topical salves
3. Marijuana flower
4. Sublingual dissolving tablets and strips
5. Tinctures

6. Water soluble THC powder
7. Hashish
8. Cannabis oil vaporizers
9. Cannabis oil capsules
10. Marijuana infused food and beverages such as cookies, brownies, gummies, etc.

#### 1.4 Keeping it Simple with our goals and vision

Simplicity Dispensary's goals include:

- Serving customers 21 years of age or older with a wide variety of high quality laboratory-tested cannabis and derivatives;
- Assisting the town of Grafton in offsetting the cost of Simplicity Dispensary's operations within its community by paying a 3% of revenue fee directly to the city;
- Hiring employees and contractors from local and city communities
- Hiring a diverse staff
- To provide a dispensary and manufactured products that caters to all peoples by showing compassion and acceptance of differences

- Providing customers with products that are based on desired effects (“Create”, “Dream”, “Chill”) opposed to confusing strain names:



## **II. Company Overview**

### 2.1 Structure

Haze of Grafton, LLC d/b/a Simplicity Dispensary is a Massachusetts limited liability company which will be applying for a license from the Massachusetts Cannabis Control Commission (the “Commission”) to operate a Marijuana retail dispensary, cultivation and marijuana product manufacturing facility in the Commonwealth.

Haze of Grafton, LLC is majority owned by Colonel Boothe.

Colonel Boothe is a cannabis veteran who has been an advocate for minority inclusion in the Massachusetts cannabis industry.

#### Colonel Boothe

A seasoned entrepreneur Colonel Boothe has owned a variety of businesses such as restaurants, real estate development and as of recently has opened one of the eco-friendliest cannabis facilities in Massachusetts. Colonel is the co-founder and former Cultivation Director of Holistic Health Group Inc., a vertically integrated Massachusetts medical and adult use cannabis company. Colonel has helped design and manage their 34,000 sqft cannabis facility which includes greenhouse cultivation, hydrocarbon extraction, edibles manufacturing and retail sales all in one building.



[www.simplicitydispensary.com](http://www.simplicitydispensary.com)

### 2.2 Operations

Simplicity Dispensary will be located in the plaza at 135 Westboro rd, North Grafton, MA (“Grafton” or the “Town”) and has leased four units that will be renovated and retrofitted for a Marijuana Establishment (the Dispensary, Manufacturing, Cultivation, “Facility”).

Upon completion, the Facility will blend in with the aesthetic of the Grafton community and set the standard of what a community focused Marijuana Establishment should be.

The Facility's prior use was a retail store and restaurant, overall, the property in which the Facility is located is in good condition albeit some interior/exterior upgrades are desperately needed. The Facility's exterior renovation will include porch, siding, electrical, plumbing, HVAC and patio upgrades. Parking lot refinishing, replacing old windows, painting the building, adding security cameras and retrofitting the existing structure to meet Simplicity Dispensary's needs for an adult use Marijuana Establishment. Upon completion of the renovations, the marijuana facility will encompass a total of approximately 5,500 square feet including a secure loading and unloading parking lot in the back of the building.

Simplicity Dispensary will establish inventory controls and procedures for reviewing comprehensive inventories of marijuana products; conduct a monthly inventory of stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

No marijuana product, including marijuana flower, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories.

Simplicity Dispensary will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

Simplicity Dispensary will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and

\$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission.

Simplicity Dispensary will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

Simplicity Dispensary will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure primarily by utilizing LED lighting when possible.

Prior to commencing operations, Simplicity Dispensary will provide proof of having an escrow account with funds amount equal to its licensure fee payable to the Marijuana Regulation Fund. The account will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of any 935 CMR 500.000 regulation or the cessation of operation of Simplicity Dispensary.

Simplicity Dispensary and Simplicity Dispensary agents will comply with all local rules, regulations, ordinances, and bylaws.

## 2.3 Security

One of the primary benefits of the Simplicity Dispensary is the parking lot around the building. This will allow us to safely load product into the facility and provides us with an area to store cannabis waste.

Simplicity Dispensary will contract with an alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

Simplicity Dispensary's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs.



The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only Simplicity Dispensary's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the Facility, and a visitor log will be maintained in perpetuity.

All agents and visitors will be required to visibly display a visitor's ID badge / sticker, and Simplicity Dispensary will maintain a current list of individuals with access.

On-site consumption of marijuana by Simplicity Dispensary's employees and visitors will be prohibited.

Simplicity Dispensary will have security personnel on-site during business hours to check identification prior to allowing customers on the sales floor.

## **2.4 Benefits to the community at large**

Simplicity Dispensary looks forward to working cooperatively with the Grafton leadership to ensure that Simplicity Dispensary operates as a responsible, contributing member of the community. Simplicity Dispensary anticipates establishing a mutually beneficial relationship with the town in exchange for permitting Simplicity Dispensary to site and operate a Marijuana Establishment in Grafton.

The City stands to benefit in various ways, including but not limited to the following:

Jobs:

Simplicity Dispensary will add approximately 15 full-time jobs, in addition to hiring qualified, local contractors and vendors. Entry level jobs will start around \$20 per hour.

### Monetary Benefits:

A Host Community Agreement with significant monetary donations will provide the City with additional financial benefits beyond local property taxes.

### Access to Quality Product:

Simplicity Dispensary will allow qualified consumers in the local community to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants

### Compliance:

In addition to the Cannabis Control Commission, the Grafton Police Department and other municipal departments will have oversight over Simplicity Dispensary's security systems and processes.

### Responsibility:

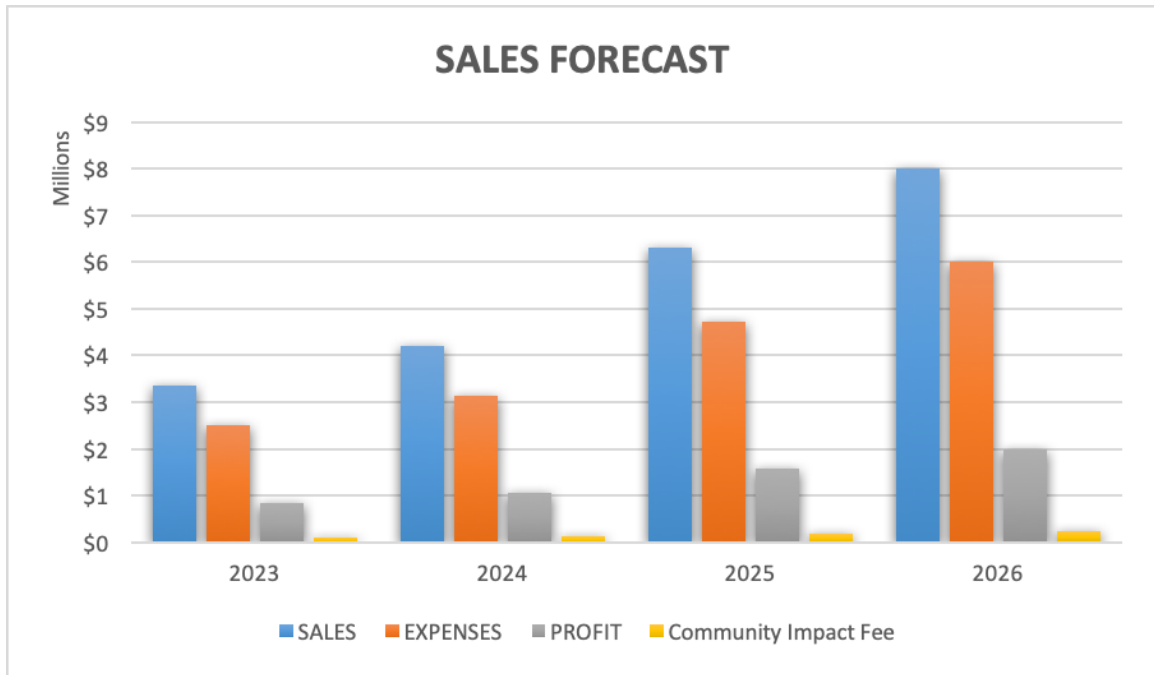
Simplicity Dispensary is comprised of experienced professionals who will be thoroughly background checked by the Cannabis Control Commission.

## 2.5 Zoning

The address for the dispensary is 135 Westboro rd, North Grafton, MA 01536. The retail Marijuana Establishment complies with all Grafton's zoning requirements.

Additionally, in accordance with the Grafton’s Zoning Ordinances the retail Marijuana Dispensary is not located within 500 feet of a public or private school providing education in kindergarten or any of grades 1 through 12.

## 2.6 Sales Forecast



Simplicity Dispensary will pay the Town Grafton a Community Impact Fee of 3% of all gross sales. Sales estimates are the following:

YEAR	SALES	EXPENSES	PROFIT	COMMUNITY IMPACT FEE
2024	\$ 3,360,000.00	\$ 2,520,000.00	\$ 840,000.00	\$ 100,800.00
2025	\$ 4,200,000.00	\$ 3,150,000.00	\$ 1,050,000.00	\$ 126,000.00
2026	\$ 6,300,000.00	\$ 4,725,000.00	\$ 1,575,000.00	\$ 189,000.00
2027	\$ 8,000,000.00	\$ 6,000,000.00	\$ 2,000,000.00	\$ 240,000.00

### **III. MARKET OVERVIEW**

#### **3.1 Industry**

Following the first legal adult-use sales in Massachusetts in November 2018, the Commission has continued to approve new retail shops across the state on a rolling basis. In Massachusetts, adult use retail sales are expected to reach \$1.4 billion by 2025, according to New Frontier Data and BDSA.

#### **3.2 Proposed Customers**

Simplicity Dispensary will only sell marijuana and marijuana products to customers ages 21 years and older that provide a valid identification and individuals. Simplicity Dispensary's intended customers are residents of Grafton and the neighboring municipalities along with folks traveling through the Westboro rd neighborhood.

#### **3.3 Competition**

Simplicity Dispensary's competition will primarily include the operational retail Marijuana Establishments that are located throughout the Grafton area. Additional competition will come from the retail Marijuana Establishments in Shrewsbury.

#### **3.4 Competitive Advantage**

Simplicity Dispensary is cognizant that the adult-use retail marijuana industry in Massachusetts is highly competitive. To compete in this highly competitive industry, Simplicity Dispensary has assembled a team with experience in the retail, business, healthcare, real estate and distribution industries.

Simplicity Dispensary's team also has deep roots to the Town of Grafton and the surrounding communities that will help attract customers to Simplicity Dispensary's retail Marijuana Establishment and provide a sense of comfort to neighboring businesses and abutters. Furthermore, the proposed interior and exterior design of Simplicity Dispensary's facility will create a safe and welcoming environment for its customers while contributing to the rejuvenation of the neighborhood and the Town. Ultimately, this combination of factors will help separate Simplicity Dispensary from its competition and contribute to the success of its business.

### **3.5 Regulations**

Simplicity Dispensary intends to operate as a retail Marijuana Establishment, consistent with the objectives of 935 CMR 500.000.

Haze of Grafton d/b/a Simplicity Dispensary is registered to do business in the Commonwealth of Massachusetts as a limited liability company. Simplicity Dispensary will maintain the limited liability company in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

Simplicity Dispensary will apply for all state and local permits and approvals required to renovate and operate the Facility as a retail Marijuana Establishment.

Simplicity Dispensary will also work cooperatively with various municipal departments to ensure that the Facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

## IV. MARKETING AND SALES

### 4.1 Customer connection strategy

Simplicity Dispensary's plan to grow the company includes:

- Strong and consistent branding;
- Intelligent, targeted, and compliant marketing programs;
- A valuable loyalty program;
- A diverse and knowledgeable staff made of passionate professionals.

### 4.2 Communication

Simplicity Dispensary will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, pursuant to 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the advertisement. Where possible the marketing and branding materials will be in multiple languages.

All marketing, advertising, and branding produced by or on behalf of Simplicity Dispensary will include the following warning, including capitalization, in accordance with CCC regulations:: "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy

and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact police via 9-1-1. This product may be illegal outside of MA.”

Simplicity Dispensary will seek to advertise at events only where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, Simplicity Dispensary will market its products and services to reach a wide range of qualified consumers.

Once finalized, Simplicity Dispensary will communicate with customers through:

- A company run website;
- A video blog;
- Popular cannabis social networks such as iHeartJane, WeedMaps and Leafly;
- Popular social media platforms such as Instagram, Facebook, Twitter, and TikTok;
- Opt-in direct communications.

Simplicity Dispensary will provide a catalog and a printed list of the prices and strains of marijuana available to consumers and will post the same catalog and list on its website and in the retail store.

### 4.3 Sales

Simplicity Dispensary intends to sell its product and service by engaging customers with knowledgeable in-store personnel.

Simplicity Dispensary will ensure that all marijuana products that are provided for sale to consumers are sold in tamper / child-resistant packaging, or a child resistant exit bag.

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package that states: "INCLUDES MULTIPLE SERVINGS."

Each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

## Timeline

<u>Date</u>	<u>Event</u>
November 2023	Submit manufacturing license application
December 2023	Receive certificate of occupancy for dispensary and manufacturing space currently under construction
January - 2024	Receive provisional license for manufacturing for product manufacturing kitchen
February - 2024	Receive commence operation for marijuana product manufacturing kitchen

## 5. SECURITY

### 5.1 Interior / Exterior Security

Simplicity Dispensary has started the security design process with Eagle Alarm Co. which has provided security equipment and monitoring to other cannabis companies in Massachusetts

Simplicity Dispensary will have a Security Operations Manager whose role is to ensure the development and overall management of the Security Policies and Procedures for Simplicity Dispensary, implementing, administering, and revising the policies as needed. In addition, the Security Operations Manager will be appointed to perform the following duties:

- Provide general training to Simplicity Dispensary agents during new hire orientation or recurring trainings throughout the year;
- Provide training specific for Dispensary Agents prior to the Dispensary Agent commencing job functions;
- Review and approve incident reports and other reports written by Dispensary Agents or Managers prior to submitting to the executive management team;
- Maintain lists of agents authorized to access designated areas of the Simplicity Dispensary facility, including cash and product storage vaults, surveillance and network equipment room, and other highly sensitive areas of the Simplicity Dispensary facility;

- Lead a working group and designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of Simplicity Dispensary agents and assets;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with the Grafton Police and Fire Department.

SIMPLICITY



DISPENSARY

Haze of Grafton, LLC d/b/a Simplicity Dispensary

135 Westboro rd, North Grafton, MA 01536

## **Separating recreational from medical operations, if applicable**

This is not applicable for Haze of Grafton retail stores. Haze of Grafton currently only operates in the adult use market.

SIMPLICITY



DISPENSARY

Haze of Grafton, LLC d/b/a Simplicity Dispensary  
135 Westboro rd, North Grafton, MA 01536

# Quality Control & Product Testing Policy

## General

Any member of staff required to come into contact with marijuana or marijuana products will be trained to the same standards as food handlers as stated under 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.

## Hygiene

Haze of Grafton, LLC understands the need for the highest standards of hygiene and will comply with the CCC regulation 935 CMR 500.105 (3) General Operational Requirements for Marijuana Establishments - Requirements for the handling of marijuana and 105 CMR 590.000 in accordance with the following plan.

## **Personal**

All members of staff, whether in direct contact with marijuana and marijuana products, or not, will be expected to maintain adequate personal cleanliness including washing hands thoroughly in the hand-washing facilities provided before starting work, and at any time when hands may have become soiled or contaminated. Our numerous hand-washing facilities are conveniently placed and offer running water at a suitable temperature. Hand-drying amenities are available at all hand-washing facilities.

Haze of Grafton, LLC facility is equipped with readily accessible staff toilets that are maintained in a sanitary condition and in good repair.

## **In the facility**

Cleaning and maintenance of the facility, your workspace, the office, bathrooms and storage areas is the responsibility of the team as a whole. Cleaning tasks will be assigned to individuals on a rota basis by the facility managers. The correct performance of these tasks will ensure that the building, fixtures and other physical facilities are maintained in a sanitary condition.

The cleaning products and equipment necessary to maintain standards of cleanliness and sanitation are safely stored in their own area. All toxic products shall be identified and stored in a manner that prevents them from contaminating any marijuana or marijuana products.

To prevent unpleasant odors and avoid attracting unwanted pests it is essential that litter and waste are removed and disposed of correctly. All staff will receive training in the required protocols for the correct manner of disposing of waste pursuant to 935 CMR 500.105 (12). Our countertops, furnishings, contact surfaces, tools and equipment have all been designed or selected for the ease with which they may be kept clean and sanitized. All shall be cleaned as frequently as is necessary to protect against contamination. All shall be cleaned using an EPA-approved sanitizing product in accordance with the instructions on the label.

## **Storage and handling**

While all products handled in Haze of Grafton, LLC facility will be stored in compliance with state regulations as outlined in 935 CMR 500.150 (2), (3), and (11) All staff that are required to handle edible marijuana products whether during manufacture, storage, or shipping, shall receive training in Food Handling pursuant to 105 CMR 590.000.

## **Infrastructure**

Haze of Grafton, LLC facility has access to the public water supply that provides an abundant source of safe, potable water capable of meeting and exceeding the Haze of Grafton's needs. Our plumbing infrastructure is adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Haze of Grafton. Our sewage system is fully capable of conveying sewage and liquid disposable waste from our establishment. The water supply and sewage systems are entirely separate and independent of each other.

## **Transportation to and from our facility**

It is essential that the storage and transportation of marijuana and marijuana products is conducted in a manner that ensures these items and their packaging are protected from physical, chemical, and microbial contamination.

Products are generally delivered to our facility by vehicles belonging to either a licensed cultivator, manufacturer, or third-party transporter in temperature-controlled vehicles that are, pursuant to 21 CFR 1.908(c), specifically designed, maintained, and equipped to provide an ambient temperature and environment to ensure the safe transportation of marijuana and marijuana products.

All staff engaged in the shipping and receiving of goods must remain alert to the sanitation and hygiene standards of these vehicles and must report any concerns or misgivings to their supervisor. Particular attention should be paid to whether the vehicle and cargo area are in an appropriate sanitary condition for the transportation of food; free of visible pest infestation or any previous cargo that could cause the product to become unsafe during transportation.

## **Inspection**

Inspections are generally conducted prior to the initial issue of a license or at the time of renewal. However, additional inspections may be made whenever the Commission deems it necessary for legal, statutory, or regulatory enforcement. We are licensed to conduct business as a Marijuana Establishment. A condition of this license is that we provide consent to the Cannabis Control Commission or its agents to inspect all areas of our facility (including company vehicles), all marijuana establishment agents and activities, and all records.

The administrative side of our company will be conducted in a manner that allows for the efficient and timely presentation of any required document at the Commission's convenience.

These records may include, but are not limited to the following:

- Documentation of compliance with the testing requirements of 935 CMR 500.160
- Written policies and procedures for the production or distribution of Marijuana Products in accordance with 935 CMR 500.130.
- Written operating procedures as required by 935 CMR 500.105(1)
- Inventory records as required by 935 CMR 500.105(8)
- Marijuana production records for all marijuana products as required by 935 CMR 500.105(8)
- The following personnel records:
  - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions.
  - 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 Haze of Grafton and shall include, at a minimum, the following:
    - all materials submitted to the Commission pursuant to 935 CMR 500.030(2)
    - documentation of verification of references
    - the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters
    - documentation of periodic performance evaluations; a record of any disciplinary action taken
    - notice of completed responsible vendor and eight-hour related duty training.
  - A staffing plan that will demonstrate accessible business hours
  - Personnel policies and procedures
  - All background check reports obtained in accordance with 935 CMR 500.030.
- Business records, which shall include manual or computerized records of
  - Assets and liabilities
  - Monetary transactions
  - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers
  - Sales records including the quantity, form, and cost of marijuana products
  - Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Haze of Grafton, including members of the nonprofit corporation, if any.
- Waste disposal records as required under 935 CMR 500.105(12)
- Visitors log
- Consumer Education Materials

- In the event that a Haze of Grafton closes, all records must be kept for at least two years at the expense of the Haze of Grafton and in a form and location acceptable to the Commission.

## **Packaging and Labeling**

All products developed by Haze of Grafton, LLC will be in accordance with general operational requirements for Marijuana Establishments under 935 CMR 500.105, as well as operational requirements required under 935 CMR 500.130: Additional Operating Requirements for Marijuana Product Manufacturers. In addition to these operational requirements any marijuana product developed by Haze of Grafton, LLC must be packaged and labeled as required by 935 CMR 500.105 (5) Labeling of Marijuana and Marijuana Products and 500.105 (6) Packaging of Marijuana and Marijuana Products. Further to these CCC regulations all edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.

### **Labeling of Marijuana and Marijuana Products.**

Prior to Marijuana being sold or transferred, Haze of Grafton shall ensure the placement of a legible, firmly Affixed label on which the wording is no less than 1 /16 of an inch in size on each package of Marijuana that it makes available for retail sale.

The Affixed label shall contain at a minimum the following information:

1. The name and registration number, telephone number, email address of the Product Manufacturer that produced the Marijuana, together with the Product Manufacturer's business telephone number, electronic mail address, and website information, if any;
2. The date that the Product Manufacturer packaged the contents and a statement of which Licensee performed the packaging;
3. A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and Processing;
4. Net weight or volume in U.S. customary or metric units, listed in that order;

5. The full Cannabinoid Profile of the Marijuana contained within the package, including THC and other Cannabinoid levels;
6. A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L c. 94G, § 15;
7. This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;
8. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains Marijuana:



9. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



10. 935 CMR 501.105(5) (a) may not apply to Marijuana packaged for transport of wholesale cultivated Marijuana in compliance with 935 CMR 501.105(13); provided however, that Haze of Grafton is responsible for compliance with 935 CMR 501.105(5) for all Marijuana Products sold or displayed to Customers.

(b) Labeling of Edibles.

Prior to Edibles being sold or Transferred, Haze of Grafton shall place a legible, firmly Affixed label on which the wording is no less than 1 / 16 of an inch in size on each Edible that it prepares for retail sale or wholesale.

The Affixed label shall contain at a minimum the following information:

1. The name and registration number of the Marijuana Product Manufacturer that produced the Marijuana Product, together with the Marijuana Product Manufacturer's business telephone number, e-mail address and website information, if any;
2. The name of the Marijuana Product;
3. Refrigeration of the product is required, as applicable;
4. Total net weight or volume in U.S. customary and metric units, listed in that order, of the Marijuana Product;
5. The number of servings in the Marijuana Product and the specific weight in milligrams of a serving size;
6. The type of Marijuana used to produce the product, including what, if any, Processing technique or solvents were used;
7. A list of ingredients, including the full Cannabinoid Profile of the Marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (delta 9-THC) and other Cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
8. The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;
9. The date of creation and the recommended "use by" or expiration date which may not be altered or changed;
10. A batch number, sequential serial number and bar codes when used, to identify the batch associated with manufacturing and Processing;
11. Directions for use of the Marijuana Product;

12. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15; 13. A warning if nuts or other Known Allergens are contained in the product;

14. This statement, including capitalization: “The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. **KEEP THIS PRODUCT AWAY FROM CHILDREN.**”;

15. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains Marijuana:



16. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



17. 935 CMR 501.105(5)(b) shall apply to Edibles produced by an Haze of Grafton for transport to another Licensee in compliance with 935 CMR 501.105(8) and shall be in addition to any regulation regarding the appearance of Edibles under 935 CMR 501.150.

(c) Labeling of Marijuana Concentrates and Extracts.

Prior to Marijuana concentrates or extracts being sold or Transferred, Haze of Grafton shall place a legible, firmly Affixed label on which the wording is no less than 1 / 16 of an inch in size on each Marijuana concentrate container that it prepares for retail sale or wholesale.

The Affixed label shall contain at a minimum the following information, but may not include a Qualifying Customer's name:

1. The name and registration number of the Marijuana Product Manufacturer that produced the Marijuana Product, together with the Marijuana Product Manufacturer's business telephone number and e-mail address;
2. The name of the Marijuana Product;
3. Product identity, including the word "concentrate" or "extract", as applicable;
4. Total net weight or volume expressed in U.S. customary units and metric units, listed in that order, of a Marijuana Product;
5. If applicable, the number of servings in the Marijuana Product and the specific weight in milligrams of a serving size;
6. The type of Marijuana used to produce the product, including what, if any, Processing technique or solvents were used;
7. A list of ingredients including, but not limited to, the full Cannabinoid Profile of the Marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (delta 9-THC) and other Cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume, and the amount of specific additives infused or incorporated during the manufacturing process, whether active or inactive including, but not limited to, thickening agents, thinning agents, and specific terpenes, expressed in absolute terms and as a percentage of volume;
  - a. For Marijuana Vaporizer Devices, identification of specific additives shall include, but not be limited to, any additives identified on the FDA's Inactive Ingredient Database for "Respiratory (inhalation)" or "Oral" routes of administration and based on dosage form as an aerosol product or inhalant. The FDA Inactive Ingredient Database is available at <https://www.fda.gov/media/72482/download>. If the FDA database or its equivalent is no longer available, Haze of Grafton shall use the database identified by the Commission.
  - b. For Marijuana Vaporizer Devices produced using only cannabis-derived terpenes, the following statement: "This product was produced using only cannabis-derived terpenes."
  - c. For Marijuana Vaporizer Devices produced using terpenes other than cannabis-derived terpenes, the following statement: "This product was produced using terpenes derived from sources other than cannabis."

8. The date of creation and the recommended "use by" or expiration date;
9. A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and Processing;
10. Directions for use of the Marijuana Product;
11. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date(s) of testing in accordance with M.G.L. c. 94G, § 15. Marijuana Products that are required to undergo more than one screening shall list all applicable dates of testing;
12. A warning if nuts or other Known Allergens are contained in the product;
13. This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;
14. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains Marijuana:



15. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



16. 935 CMR 501.105(5)(c) shall apply to Marijuana concentrates and extracts produced by Haze of Grafton for transport to another Licensee in compliance with 935 CMR 501.105(13).

(d) Labeling of Marijuana Infused Tinctures, Topicals or Other Non-edible Marijuana infused Products.

Prior to Marijuana-infused Tinctures, topicals or other non-edible Marijuana-infused Products being sold or Transferred, Haze of Grafton shall place a legible, firmly Affixed label on which the wording is no less than 1 /16 of an inch in size on each container of Marijuana-infused Product that it prepares for retail sale or wholesale.

The Affixed label shall contain at a minimum the following information:

1. Haze's company name and license number, together with Haze's business telephone number, e-mail address and website information, if any;
2. The Marijuana Product's identity;
3. The type of Marijuana used to produce the product, including what, if any, Processing technique or solvents were used;
4. A list of ingredients, including the full Cannabinoid Profile of the Marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (delta 9-THC) and other Cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
5. Total net weight or volume as expressed in U.S. customary units and metric units, listed in that order, of the Marijuana Product;
6. If applicable, the number of servings in the Marijuana Product and the specific weight in milligrams of a serving size;
7. The date of product creation;
8. A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and Processing;
9. Directions for use of the Marijuana Product;
10. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
11. A warning if nuts or other Known Allergens are contained in the product;
12. This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential

harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;

13. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains Marijuana:



14. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



15. 935 CMR 501.105(5)(d) shall apply to Marijuana-infused Tinctures and topicals produced by Haze of Grafton for transport to another Licensee in compliance with 935 CMR 501.105(8).

## **Packaging of Marijuana and Marijuana Products.**

(a) Child-resistant Packaging. Haze will ensure that all Marijuana and Marijuana Products that are provided for sale to customers shall be sold in child-resistant packaging or in a child proof exit bag.

To comply with 935 CMR 501.105(6), Haze of Grafton shall ensure:

1. That to the extent it is not Unreasonably Impracticable for the specific type of product, Marijuana Products are packaged in containers that are:

- a. Opaque and plain in design;
- b. Do not use bright colors, cartoon characters and other features designed to appeal to minors;
- c. Resealable for any Marijuana Product intended for more than a single use or containing multiple servings;

2. That where compliance with the requirements of child-resistant packaging is deemed to be Unreasonably Impracticable or too challenging for customers to maneuver, Marijuana Products shall be placed in an packaging that is:

- a. Capable of being resealed after it has been opened; and
- b. Includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: "KEEP OUT OF REACH OF CHILDREN".

**(b) Limits on Packaging Design.**

Packaging for Marijuana or Marijuana Products sold or displayed to customers, including any label or imprint Affixed to any packaging containing Marijuana or Marijuana Products or any exit packages, may not be attractive to minors. Packaging is explicitly prohibited from:

1. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain Marijuana;
2. Featuring cartoons;
3. Featuring a design, brand or name that resembles a non-Cannabis consumer product of the type that is typically marketed to minors;
4. Featuring symbols or celebrities that are commonly used to market products to minors;
5. Featuring images of minors;
6. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

**(c) Packaging of Multiple Servings.**

1. Packaging for Marijuana Products sold or displayed for customers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: "INCLUDES MULTIPLE SERVINGS."
2. Packaging for Marijuana Products in solid form sold or displayed for customers in multiple servings shall allow a customer to easily perform the division into single servings.

a. Edibles in a solid form shall be easily and permanently scored to identify individual servings.

b. Notwithstanding 935 CMR 501.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product can be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to Licensees.

(d) Each single serving of an Edible contained in a multiple-serving package may be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 501.105(5) that indicates that the single serving is a Marijuana Product.

(e) Serving size shall be determined by Haze of Grafton.

(f) CMOs shall comply with the packaging requirements in 935 CMR 500.105(6): Packaging of Marijuana and Marijuana Products For adult use sales.

### **Packaging and Labeling Pre-approval.**

Prior to Marijuana or Marijuana Product being sold at Haze of Grafton, the company will submit an application for packaging and label approval to the Commission. An application for pre approval may be submitted at any time prior to Marijuana or Marijuana Product being sold or at any time a substantive change is made to the packaging or labeling of Marijuana or Marijuana Product. The Commission shall charge a fee for packaging and labeling pre approval pursuant to 935 CMR 501.005.

(a) Packaging and labeling pre approval review shall be limited to the physical attributes of, and statutorily required warnings on, the packaging and label, including but not limited to legibility, but may not include a review of specific Independent Testing Laboratory test results required pursuant to 935 CMR 501.105(5). The packaging and labeling pre approval process shall be in addition to the requirements of 935 CMR 501.105(5) and (6).

(b) In addition to an application for packaging and labeling preapproval in a form and manner determined by the Commission, an applicant for pre approval shall submit electronic files of the following to the Commission:

1. For packaging pre-approval, two images of the packaging, one depicting the front of the packaging and one depicting the back of the packaging. Photographs shall be electronic files in a JPEG format with a minimum photo resolution of 640 x 480 and print resolution of 300 DPI. Photographs shall be against a white background.

2. For labeling pre-approval, one image of each label is requested for review. Photographs shall be electronic files in a JPEG format with a minimum photo resolution of 640 x 480 and print resolution of 300 DPI. Photographs shall be against a white background.

(c) The Commission shall make every effort to make a pre-approval determination based on information submitted. In the event that a pre-approval determination is unable to be made conclusively based on submitted photographs, the Commission may request to view the packaging or label in person or through a video conference. Any such request by the Commission shall be made to the applicant electronically or in writing.

## **Quality Assurance Procedure:**

### **1. Quality Assurance/Quality Control Sampling**

a. To ensure that the items are filled within acceptable error some of the items are inspected. To determine how many items need to be inspected in the lot, the square root of the total number of products plus one or  $(\sqrt{n})+1$  is used where n represents the total lot of items. For example if there are 100 items in the lot then  $(\sqrt{(100)})+1 = 11$  items to be inspected.

### **2. Product Inspection**

a. Products should be inspected for weight of total package, visual defects, correct labeling, and correct location. Data should be recorded in QA/QC chart with the respective lot number or identifying information.

## **Testing of Marijuana and Marijuana Products**

Haze of Grafton, LLC will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Any Independent Testing Laboratory relied upon by Haze of Grafton, LLC for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: Application Requirements, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: Adult Use of Marijuana; 935 CMR 501.000: Medical Use of Marijuana; and Commission protocol(s). Testing of Haze of Grafton, LLC marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products. Testing of Haze of Grafton, LLC environmental media will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission.

Haze of Grafton will not sell or otherwise market for adult use any Marijuana Product that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160 Required testing includes:

1. Cannabinoid Profile
2. Contaminants as specified by the CCC including, but not limited to:
  - a. Mold
  - b. Mildew
  - c. Heavy metals
  - d. Plant-Growth Regulators and Pesticides
  - e. Bacteria
  - f. Fungi
  - g. Mycotoxins.

Haze of Grafton will maintain the results of all testing for no less than one year.

Haze of Grafton will arrange for testing to be conducted in accordance with the frequency required by the CCC. If a batch of marijuana fails a quality assurance independent lab test, it will be quarantined and stored away from other products and the CCC will be notified within 72 hours of these results. Haze of Grafton will submit to the CCC upon their request, any information regarding contamination. The batch will be retested, remediated or destroyed as determined by Management.

### **Marijuana Infused Products**

Marijuana infused products (MIPs) should be ground and thoroughly mixed, if possible, to be homogenized. A grinding device that minimizes loss will be used. The grinding device must be cleaned thoroughly after each use.

Employees should use the following steps to ensure all protocols are met:

- The sample will be collected using clean, stainless steel tools (or tools made from another inert material) and placed in an appropriate sample container made of suitable materials.

The minimum representative sample (as determined by the independent testing laboratory) is 4.0 grams or one product serving. The number of samples will be determined based on size the of production batch:

- Three samples from production batches less than equal to 1 kg
- Five samples from production batches greater than or equal to 1 kg and less than 5 kg
- Ten samples from production batches greater than or equal to 5 kg

### **MIP Testing**

Production batches of concentrate that are designated for MIP production will be transferred from the Laboratory Department to the Kitchen Department after receiving the passing test results described above. Finished MIPs will then be subjected to testing for bacteria/fungi/mycotoxin and cannabinoid testing. Production batches will be discarded and not dispensed to purchasers if any biological contaminant limit is exceeded.

## **Policy for Responding to Laboratory Results that Indicate Contaminant Levels are Above Acceptable Limits**

If a laboratory test result indicates that a Haze of Grafton's marijuana product sample has contaminant levels above the acceptable limits established in the CCC protocols identified in 935 CMR 500.160(1) Haze of Grafton will:

1. Immediately segregate the production batch and evaluate next steps.

The management team and CEO will determine whether to:

- i. Retest the Production Batch
- ii. Remediate the Production Batch
- iii. Dispose of Production Batch

2. If the test result indicates a contaminant level for Pesticides that are above the acceptable limits the Production Batch will be immediately disposed of.

3. If it is determined that the Production Batch cannot be remediated, it will be disposed of.

4. In the case of disposal under 1 and 2 above the Haze of Grafton's management team or CEO will:

a. Notify the Commission within 72 hours of the laboratory testing results indicating that the contamination cannot be remediated.

b. The notification to the Commission will describe the proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

5. In the case of any test result that indicates that a Haze of Grafton marijuana product samples have contaminant levels above the acceptable limits, the management team and CEO will conduct an assessment of the source of the contamination.

a. This extensive assessment will include investigating all possible sources of contamination including source products and ingredients, environmental conditions and employee factors.

b. The assessment should include a corrective action plan and be shared as a training tool with all production and processing agents.

SIMPLICITY



DISPENSARY

Haze of Grafton, LLC d/b/a Simplicity Dispensary

135 Westboro rd, North Grafton, MA 01536

# **Personnel policies including background checks**

The Haze of Grafton Staffing and Training Plan (Training Plan in development) details the processes the Human Resource Manager will use to manage human resources in order to provide the highest quality service and education to customers while acting in compliance with CCC regulations. The Human Resource Manager is assigned responsibility for maintaining and updating the Plan, which will ensure that Haze of Grafton has sufficient staff possessing the correct skill-sets and experience needed to ensure the success of all operations.

Haze of Grafton encourages personal growth, development and empowerment for its employees. All employees are encouraged to provide input and suggest new policies and processes.

## **CONFIDENTIAL DATA STORAGE**

Employee data will be stored in Microsoft Azure via Office 365's SharePoint document management system or a similar competing product. Data will be stored within the Microsoft cloud and is secured with HIPPA compliant security protocols.

All employee data will be entered directly into Office 365 through an internet browser using Secure Socket Layer (“SSL”) connections. All SSL connections are established using 2048-bit keys.

Once data has reached Office 365 it will be encrypted with BitLocker which uses Advanced Encryption Standard with 256-bit keys.

## **FAIR EMPLOYMENT PRACTICES POLICY**

Haze of Grafton is committed to providing all employees with a safe, healthy and economically beneficial working environment. Workplace safety and environmental standards are of utmost concern to Haze of Grafton, as the welfare of our employees greatly impacts our ability to operate successfully.

Fair employment practices, including the prohibition against all forms of illegal discrimination, will be prioritized and enforced at all times through Haze of Grafton codes of conduct. All Haze of Grafton employees will receive access to generous benefits packages and rates of compensation that exceed state minimum standards. By providing equal access and fair treatment to all employees we will improve the Haze of Grafton’s success while enhancing the progress of individuals and the community in which our business operates.

## **COMPENSATION STANDARDS AND TIME OFF**

The standard Haze of Grafton workweek is 40 hours of work. Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt employee's regular hourly rate.

Each employee’s hourly wage or annual salary will be reviewed at least once each year. Increases will be determined by the ability of the Haze of Grafton to financially support them on the basis of performance, adherence to laws, Haze of Grafton policies and procedures and the ability of employees to meet or exceed duties per job description and achieve performance goals.

Haze of Grafton will provide all employees with competitive wages based upon position and tenure. Standard Haze of Grafton wages range from \$18/hour to \$125k+ annually. By providing our employees with adequate compensation, we reinforce our commitment to investing in the progress of individuals and the establishment of a highly capable and experienced team. It is a goal of Haze of Grafton to establish long-term employment opportunities for all employees.

Haze of Grafton will offer its regular full-time employees paid vacation after 4 months of employment. The terms could change as we grow but initially they will receive two weeks of paid vacation and after three years of service they will receive three weeks of paid vacation days that accrue over a soon to be determined schedule.

Additionally, Haze of Grafton will provide unpaid leave opportunities for all employees to care for the employee's child after birth or placement for adoption or foster care, to care for the employee's spouse, son, daughter or parent, who has a serious health condition, for a serious health condition that makes the employee unable to perform the employee's job and for a qualifying exigency or military caregiver leave.

## **BENEFITS**

Haze of Grafton is committed to providing a generous employee benefit program for all employees and agents. All Haze of Grafton employees will eventually have the opportunity to participate in a 401(k) plans and other types of retirement programs with a Haze of Grafton funds match. Employees will also be presented with access to competitive health insurance programs and/or a health savings account (HSA) program for their entire family. 125 Flexible Spending Accounts will be established for participating employees, allowing participants to set aside pre-tax dollars to pay for certain types of expenses.

Haze of Grafton will establish access to three plans:

- (1) for medical expenses,
- (2) for dependent care expenses and

(3) for certain commuting expenses.

Haze of Grafton will additionally provide employees with options for participating in long-term and short-term dental and vision coverage, disability insurance and life insurance programs.

Additionally, Haze of Grafton will establish an educational scholarship program for employees designed to reimburse certain educational expenses for programs that benefit employee progression in the Haze of Grafton.

Bonuses are variable, generally around 5% of an individual's total yearly salary but could exceed that if dispensary sales can support it. Additionally, all bonuses are at the discretion of the Chief Executive Officer, Chief Financial Officer and the Chief Operating Officer.

## **POTENTIAL EMPLOYEE SCREENING AND MONITORING**

It is critical for the security of Haze of Grafton that only the most qualified, credible, talented and culturally diverse people are hired to help avoid workplace theft, fraud or violence.

It's equally important for the Haze of Grafton to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors and other contractors who have access to the Haze of Grafton's property or represent the Haze of Grafton brand. Knowing the background of these workers is required to protect the integrity of the Haze of Grafton's organization, as well as the safety of customers. Therefore, this workforce needs to be screened with the same due diligence as any other employee.

To help attract, hire, land and retain the best employees Haze of Grafton has developed employment screening and monitoring processes to create a candidate experience that benefits potential employees and reduce Haze of Grafton's risk by utilizing a fast, scalable and compliant background screening solution. An efficient, thorough employment screening process can, above all else, help reduce the Haze of Grafton's overall workplace risk. Identifying risk early, prior to

hiring an employee, protects the organization from risk related to physical safety, financial security, organizational image or reputation and legal compliance.

## **COMPLIANCE**

The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. The most prominent legislation that Haze of Grafton must abide by is the Fair Credit Reporting Act (“FCRA”).

## **PRE-SCREENING POTENTIAL CANDIDATES**

The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application. This will streamline Haze of Grafton’s application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

Haze of Grafton will integrate instant and automated employment screening products into the hiring process. Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as a Social Security number or name and address history. Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications.

## **Criminal History**

Haze of Grafton will screen candidates for criminal records to promote a safe, secure workplace by reducing employment-related risk linked to a criminal history. The following searches may be performed depending upon the type of position the candidate is seeking.

### **National Crime File Search**

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

### **Felony and Misdemeanor Search**

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

### **Motor Vehicle Report**

A Motor Vehicle Report (MVR) reveals the status of an applicant's driver's license and any violation history. This search should be conducted on all candidates who will have driving responsibility for Haze of Grafton.

## **VERIFICATION AND QUALIFICATION SOLUTIONS**

The Human Resources Manager may potentially utilize the following solutions depending on the level of security required for the position.

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

### **Credit Check**

This search matches the candidate's information to information held by the Credit Bureaus and returns the candidate's credit report. *Employment and/or Education Verification* These two products are used to verify the information provided by the candidate.

## **Employment Eligibility**

An employment eligibility verification service will be used to streamline the Form I-9 process. The Haze of Grafton will participate in the E-Verify program to confirm every new hire's employment eligibility by sending the information used to complete the I-9 through the Social Security Administration (SSA) and Department of Homeland Security (DHS) databases.

## **SUBSTANCE FREE WORKPLACE**

Haze of Grafton will strive for maintaining a safe working environment. In order to keep employees and customers safe Haze of Grafton will have alcohol, smoke, and drug-free workplace policies in place pursuant to CCC regulation 935 CMR 500.105. Employees will be required to be sober while within the facility. Employees and managers will be required to immediately report any incidents involving alcohol, smoke and drugs to the Human Resources manager or CEO.

## **ADJUDICATION AND ALERTS**

Haze of Grafton will provide a criminal records adjudication policy as part of the screening process. FCRA - mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.

## **MONITORING**

A Monthly Compliance Exception Report is completed for the employment screening process. The report informs the Human Resources Manager which candidates have completed various parts of the screening process and which have not. The report also updates Haze of Grafton to which components are missing from a candidate's employment screening process.

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. All employees are required to notify Haze of Grafton whenever they have any encounter with law enforcement. The Human Resources Manager will determine if a Level 2 background screening should be performed upon the employee's notice. A post-accident drug

screening may be performed at the Human Resources Manager's discretion or if required for worker's compensation purposes.

## **STAKEHOLDER FEEDBACK**

The Human Resources Manager in coordination with the Chief Operations Manager, and Chief Financial Officer will solicit and record feedback from customers, vendors, consultants, community members and groups, law enforcement and other interested parties about the competence of Haze of Grafton and our staff. Feedback requested from stakeholder should address the quality of interactions with employees, any changes in Haze of Grafton policies or procedures directly affecting the stakeholder and the effectiveness of the Haze of Grafton overall.

## **OBSERVATION AND PERFORMANCE REVIEW**

To evaluate the effectiveness of training through observation of employee performance, these evaluations should consider employee's adoption of policies, procedures, concepts and attitudes presented in the training for new employees; level of improvement, drive or lack thereof toward improvement in the performance of veteran employees; adoption of the training topics in practice and how well they are working; department managers and trainer observations of employee attitudes, methods or competency and the level of discussion between employees and department managers regarding training topics presented on an ongoing basis.

## **STAFFING PLAN**

The staffing plan will develop in three phases which are hiring, training and professional development. Hiring of employees will only be done according to established procedure when a position in the employment structure is open or management determines a new position should be created. The training will provide policies and procedures to be reviewed at length. Professional development practices will then supplement this initial training. The training and professional development will ensure that all Haze of Grafton staff grasp and comprehend the policies, procedures and relevant regulations to abide by for operations at the facility.

Company Founder Colonel Boothe has created a process where hiring managers will be given resumes that do not have the applicants name or address on them. This will assure that the hiring manager will not use the candidates name to determine their ethnicity or use the candidates address to make an assumption on their socioeconomic background. Haze of Grafton will make sure that the best candidates are hired in a process that eliminates racial and socioeconomic biases.

## **STAFF ACQUISITION PROCESS**

1. Identification of need;
2. Job classification and job description preparation;
3. Solicitation of the vacant position utilizing the methods that best fit the position;
4. Reviewing resumes on qualified candidate;
5. Performing and recording reference checks on qualified candidates;
6. Scheduling first interviews with the Human Resources Manager;
7. Scheduling second interviews with strong candidate with the HR Manager and department hiring manager;
8. Delivery of an offer letter to the first choice candidate;
9. Performing criminal background check on selected candidate;
10. Send application to the state for registration with the CCC;
11. Completion of the probationary period.

The Staffing and Training Plan is based on business plan assumptions and best practices and may be adjusted in accordance with actual operating needs. It is our policy to ensure that all employees receive professional and appropriate training on compliance with regulatory agency regulations, the therapeutic use of cannabis, safety, security, incident management and diversion and theft prevention.

## **HIRING**

Haze of Grafton's Human Resource Manager will coordinate with the COO and CFO to acquire all staff. The acquisition process may vary depending on the vacant position and special circumstances. The acquisition process will be managed by the Human Resource Manager and will always include: performing a criminal background check on the selected candidate to determine eligibility for CCC registration; application to CCC for registration; new hire orientation and training only upon successful registration; and completion of the probationary period.

All staff and Managers must comply with all **EEOC** guidelines when managing employee issues. None of our policies or practices discriminate based on or conflict with laws regarding the following: race; height and weight; credit rating or economic status; religious affiliation or beliefs; citizenship; marital status and number of children; gender; arrest and conviction; security/background checks for certain religious or ethnic groups; disability; medical questions and examinations. Positions will only be filled according to the established protocols:

### **Background Check**

Any applicant who has submitted a complete application for employment will have a professional background check conducted. This investigation will be in addition to verification that the potential employee is or will soon be licensed as a cannabis employee and thus allowed to work in the facility. The investigation will be conducted to ensure the potential employee does not have any felony convictions which would bar them from employment. The investigation will also check for any crimes of moral turpitude, whether misdemeanor or felony. Any indication of past crimes of moral turpitude will be a bar to employment. Once the applicant is determined to have passed a background check, a first interview will be initiated.

In some instances the background check will be conducted after the applicant has conducted the 1st or 2nd interview.

## **1st Interview**

The first interview will consist of a virtual or face to face meeting with the Manager of the department the applicant is interviewing for a position in. No more than 5 applicants will be selected for a first interview. The purpose of this interview will be to help determine any potential employee's: 1) level of knowledge regarding cannabis operations; 2) existing skill set relevant to the duties of the job offered; 3) their capacity to learn new skills and grasp concepts (specifically regulatory concepts); and 4) potential for deception as an employee. At least 2 references will be contacted and details of the interview confirmed. A solid background (or an appropriate level of education/experience pertaining to the position offered), a clean record and indication of honesty will be requisites for the second interview.

## **Final Interview**

The final interview will be conducted by the executive team COO and CFO (or an alternate company executive). No more than two candidates will be selected for the final interview. The COO and CFO will ask a variety of questions intended to assess the applicant's ability to interact with others and work according to Haze of Grafton's policies. The final decision will be made by the COO and CFO with input from the Manager who conducted the first interview and the Assistant General Manager. For management positions, the General Manager will jointly conduct the final interview with the department manager retaining the final decision after consulting with managing members. All potential employees must go through the entire process.

## **TRAINING**

All new hires will be required to go through a training period. Potential employees will be advised of all employment policies, the life cycle of cannabis and its growth process and the proper procedures to employ while performing their duties. Educational training will consist of presentations given by the department manager. The presentations will be supplemented with hands-on training to demonstrate the material included in the presentations. All employees will go through additional training with their Manager based on the employment role.

Being in an industry that is constantly changing requires companies to be aware of recent market developments and trends throughout the industry. Haze of Grafton takes a proactive approach to continually provide progressive training and interactive learning to our employees. This is conducted both at the individual facilities by certified Haze of Grafton trainers, but also electronically and telephonically when necessary. By exposing employees to constant training and developments, Haze of Grafton values its employees and encourages their retention with Haze of Grafton.

By training employees, it allows them from day one to have the ability to learn processes and procedures in order to take on additional responsibilities throughout the course of their employment with Haze of Grafton. With the ability to grow within Haze of Grafton and move at their own pace, Haze of Grafton encourages retention of all employees.

Our collaborative training program is designed to educate employees on best practices for maintaining their personal safety and the safety of Haze of Grafton products, including comprehensive emergency and incident management training. Training sessions may include virtual web collaborations, onsite experience and OSHA Occupational Safety Training.

### **Haze of Grafton Employee Training**

No Haze of Grafton employee or consultant may work on-site prior to receiving orientation training, taking the responsible vendor training, or when any required critical training is four weeks or more past due. The HR Manager will provide all relevant and adequate training for each individual involved in Haze of Grafton operations. Training will be tailored to the roles and responsibilities of the job function of each employee and at a minimum must include training on confidentiality, security controls, emergency response protocols and regulatory agency regulations as well as Federal statutes regarding the use of cannabis. Each employee will receive a minimum of eight hours of ongoing training annually or as deemed necessary by Haze of Grafton Managers.

## **Module Based Training**

Haze of Grafton employs a strategy of module based training. Each module will cover a single topic in - depth.

Training modules include:

1. New employee orientation;
2. Train the trainer;
3. Monthly department meetings;
4. Compliance, regulation and law;
5. Confidentiality;
6. Safety;
7. Security;
8. Emergency and incident management;
9. Inventory management and diversion prevention;
10. Cannabis science;
11. Community and customer relations;
12. Recordkeeping;
13. Product handling and sanitation; and
14. Transportation.

Haze of Grafton may develop and implement new modules as deemed necessary. General employee training will largely be department focused and relevant to the operational processes each employee will follow on a daily basis. Haze of Grafton will reassess all modules annually in order to determine if the updated training is necessary to maintain a compliant operation.

## **Training Evaluation**

In order to achieve the high standards of quality, efficiency and compliance Haze of Grafton sets forth, the Human Resources Manager shall evaluate the training program annually. Based on the results of this evaluation, the HR Manager will implement any necessary changes and determine

the need for re-training of staff. The Chief Executive Officer, Chief Financial Officer and Chief Operations Officer must approve any major training program changes. Haze of Grafton cannabis science training must address the endocannabinoid system, clinical trial information, efficacy and dosing, strains and genetics, methods of use and types of products, condition management and side effects.

The Human Resources Manager will solicit and record feedback on the quality and efficacy of a training module from employees that received the training. Feedback may be solicited utilizing post training group discussions, individual interviews and anonymous surveys

### **Oversight**

The management structure assigns responsibility for the different aspects of operation to individual Managers and staff so that every employee on every level will be accountable to a higher position. Each department has defined responsibilities and must report to management on a weekly basis regarding the duties they were assigned and progress.

The Operations and Management Practices Plan outlines the entire process and procedures to employ. The plan also defines the employment structure and the relation of employment policies to operations. The manual details the administrative processes to be employed in various situations, including disciplining employees. All discipline will be handed down by the department manager or HR Manager to help keep relations between department Managers and ground level employees smooth.

### **Employee Manual**

Upon licensing and commence of operations, all Haze of Grafton Staff will undergo a mandatory training period. During the first week of training, an employment manual will be issued to employees. The Employment manual will set forth Haze of Grafton policy regarding administrative matters, including terms of employment, what is expected of employees and procedures for discipline. Each employee must read through the manual and sign a contract acknowledging they have received, read and understand the Haze of Grafton policies.

## **Operations Manual**

The second stage of training will be an educational portion regarding cannabis and procedures. The manual will begin with a background of commercial cannabis, identify relevant legal regulations, break down the Haze of Grafton structure/roles of employees and set forth Standard Operating Procedures for each phase of operation.

Standard Operating Procedures will provide a detailed breakdown of the duties (what), methods (how) and schedule (when) by which each employee will perform the tasks of their respective positions. The HR Manager will develop a training curriculum to educate new employees. Managers will be actively training the new employees on the tasks expected of them and answering questions. At the end of the training period, the prospective employees will be given a short test regarding the policies and procedures, passage of which is a prerequisite for employment.

## **SYSTEMS TRAINING**

### **INVENTORY SYSTEM**

The HR Manager and department managers will be responsible for developing and conducting training programs for each employee who will be using a to be determined point of sale (“POS”) and inventory management software. POS representatives will train management in the various uses of the software and provide training manuals and other materials to assist in training employees. All General Management and Managers will be responsible for knowing how to properly operate the POS software.

### **EMERGENCY TRAINING**

The operating hours for the dispensaries will typically be 11 hours a day, 7 days a week. A limited number of employees will be necessary for nights and weekends but operations will continue for the product manufacturing departments. Security will be hired in-house. All employees employed by Haze of Grafton will go through a security training/debriefing with

security regarding the features of the facility, the role of security in operations and procedures in case of an emergency.

In the case of an emergency, employees will have several methods for contacting local law enforcement. The most common will be immediate referral to on-site security personnel. Security personnel have been trained or hired to provide such services. In the event security is not immediately reachable, staff will be trained to alert local authorities. In no event should an employee attempt to handle or confront an emergency situation. All matters should be referred to security or local law enforcement.

Each new hire will begin work on a four-month trial period of employment. At the end of the four months the department manager will conduct an assessment of the employee's performance.

## **FOOD HANDLING**

All employees whose job includes contact with cannabis products (edible or otherwise), production or packaging must be trained in food handling requirements found in applicable laws and regulatory agency regulations.

## **INVENTORY LOSS OR IRREGULARITIES AND REPORTING TRAINING**

Operational policies will restrict employee access to areas where they have legitimate work tasks. All areas where cannabis is stored will be locked and monitored via Closed Circuit Television. The background checks and hiring process will weed out applicants with criminal or amoral histories. Employment policies will outline the consequences of employee theft and the security briefing will make employees aware of the seriousness of the matter. Cumulatively, these policies will assist in preventing employee theft of cannabis, cannabis product or growing materials.

All staff are responsible for notifying the agent-in-charge of any loss or theft of cannabis from the dispensary so that they can promptly document and report the loss or theft to the appropriate manager and the regulatory agency. Employees will have a whistleblower policy in place to ease the concerns of any employees who suspect diversion of cannabis or cannabis products from the

facility by another employee. The report will also be submitted to the Compliance Officer for further review and investigation.

## **PROFESSIONAL DEVELOPMENT**

The purpose of the professional development stage is to provide continued education to Haze of Grafton employees regarding new operational methods, changes in rules/regulations and innovations in techniques. Haze of Grafton will evolve with the industry, embracing new technologies or processes that increase efficiency. The results will be reported to the HR Manager where necessary to determine if a promotion, raise, demotion or termination is warranted.

Every three-six months, department managers will evaluate employee performance. The results will be reported to the HR Manager. When necessary, the CEO, CFO, and COO will be consulted to decide if a promotion, raise, demotion or termination is warranted. Training will be used to address any deficient performance and educate the employee about the proper methods to use.

Hands-on instructional training to address any problems in technique or method by which an employee is performing a task.

Group meetings to ensure all employees are communicating and aware of any changes. Each department will hold group meetings on a weekly basis. The entire facility will meet as a group at least once a month to address the state of affairs.

## **REPORTING STRUCTURE**

Each department manager is responsible for ongoing performance evaluations, performance issues and recognition, promotions and disciplinary actions in their department. Managers are required to communicate all necessary information on employee performance to the HR Manager as often as necessary. Managers are required to complete formal performance reviews annually and at the end of any probationary period.

## **TERMINATION OF EMPLOYEES**

Haze of Grafton will terminate any employee or registered agent that violates the following:

- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
- Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority The Executive team, management team, security team and HR team will decide who will be terminated and coordinate the immediate removal of said employee from the facility.

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# Record Keeping procedures

## **Physical and Virtual Records Overview**

Haze of Grafton has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Haze of Grafton documents. Physical records will be stored at Haze of Grafton in a locked area designated for record retention. All written records will be available for inspection by the Commission upon request. Also, electronic copies of records will be stored in the Office 365 (or comparable cloud storage product) secured cloud storage.

## **Recordkeeping**

To ensure that Haze of Grafton is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Haze of Grafton quarter-end closing procedures. In addition, Haze of Grafton operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- Corporate Records
  - Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
    - Insurance Coverage:
      - Directors & Officers Policy
      - Product Liability Policy
      - General Liability Policy
      - Umbrella Policy
      - Workers Compensation Policy
      - Employer Professional Liability Policy
    - Third-Party Laboratory Contracts
    - Commission Requirements:
      - Annual Agent Registration
      - Annual Marijuana Establishment Registration
    - Local Compliance:
      - Certificate of Occupancy
      - Special Permits
      - Variances
      - Site Plan Approvals
      - As-Built Drawings
    - Corporate Governance:
      - Annual Report
      - Secretary of Commonwealth Filings
- Business Records
  - Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
    - Assets and liabilities;
    - Monetary transactions;
    - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    - Sales records including the quantity, form, and cost of marijuana products;

- 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 Haze of Grafton.
- Staffing Records
  - Staffing records include:
    - Job descriptions.
    - Registered agents and subsequent info:
      - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
      - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
      - Documentation of all required training.
      - Documentation of periodic performance evaluations.
      - A record of any disciplinary action taken.
      - Responsible vendor training results.
    - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
      - Personnel policies and procedures; and
      - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents  
803 CMR 2.00: Criminal Offender Record Information (CORI).
- Inventory Records
  - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Sales Records for Marijuana Retailer
  - Haze of Grafton will maintain records that it has performed a monthly analysis of the 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 the sales data and produce such records on request to the Commission.

- Incident Reporting Records
  - Within ten (10) calendar days, Haze of Grafton will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
  - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Haze of Grafton for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Haze of Grafton jurisdiction on request.
- Visitor Records
  - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name/ID of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
  - When marijuana or marijuana products are disposed of, Haze of Grafton will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Haze of Grafton agents present during the disposal or other handling, with their signatures. Haze of Grafton will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
  - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
  - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a

request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.

- o Recordings shall not be destroyed or altered and shall be retained as long as necessary if Haze of Grafton is aware of pending criminal, civil or administrative investigation or legal proceedings for which the recording may contain relevant information.
- Agent Training Records
  - o Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
  - o Haze of Grafton 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.
- Closure
  - o In the event Haze of Grafton closes, all records will be kept for at least two (2) years at Haze of Grafton expense in a form (electronic via Office 365's SharePoint platform, hard copies, etc.) and location acceptable to the Commission. In addition, Haze of Grafton will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures
  - o Policies and Procedures related to Haze of Grafton operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:
    - Security measures in compliance with 935 CMR 500.110;
    - Employee security policies, including personal safety and crime prevention techniques;

- A description of Haze of Grafton hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be processed or sold, as applicable, and the forms in which marijuana will be sold;
- Price list for Marijuana and Marijuana Products, and alternate price lists for customers with documented Verified Financial Hardship as defined in 501.002: Definitions, as required by 935 CMR 501.100(1)(f);
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
  - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
  - Engaged in unsafe practices with regard to Haze of Grafton operations, which will be reported to the Commission; or
  - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

- A list of all board of directors, members, and executives of Haze of Grafton, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on the Haze of Grafton website.
- Policies and procedures for the handling of cash on Haze of Grafton premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
  - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
  - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

- License Renewal Records
  - Haze of Grafton shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of Haze of Grafton shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.
- Record-Retention
  - Haze of Grafton will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

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## **Maintaining of financial records**

A thorough recordkeeping plan maintains the regulatory integrity of the Adult use marijuana Program and creates a record of activities, transactions, and decisions which safeguards a company's information and also holds it accountable for its actions.

Haze of Grafton has established stringent recordkeeping protocols which demonstrate fidelity to compliance and security, and safeguard customer safety. Inventory protocols, electronic tracking system use, equipment maintenance, and other extensive business records will be created and maintained in full compliance with Cannabis Control Commission ("Department"), OSHA and local regulations.

In compliance with 935 CMR 500, Haze of Grafton will maintain a daily log of each day's beginning inventory, acquisitions, amounts purchased and sold, disbursements, disposals, and ending inventory. Haze of Grafton will also record prices paid and amounts collected by customers.

The inventory protocols require all inventories and inventory audit records to be retained as part of recordkeeping policies and to ensure oversight of facility management and personnel, in

compliance with 935 CMR 500. As part of this comprehensive recordkeeping plan, Haze of Grafton will maintain critical business operations including:

- Inventory tracking, from purchase order to sale;
- Human resources data for all employees;
- Access Control System records;
- Transaction records;
- Standard Operating Procedure Compliance;
- Recall procedures and documents pertaining to recall actions; and
- Waste management, specifically including records of marijuana products destroyed at the dispensary. Keeping complete, detailed, and organized records of inventory and all dispensing transactions is critical to ensuring that customers receive the highest quality marijuana products in its purest forms.

## **ENTERPRISE RESOURCE PLANNING**

Haze of Grafton will utilize a point of sale software system that functions as an Enterprise Resource Planning ("ERP") suite, which will use bank-level encryption to comprehensively manage all inventory and satisfies HIPAA-security standards.

Standard cannabis based point of sales systems track every purchase of every product in inventory within the dispensary, both as active inventory and in back stock, every sale, in addition to tracking adult use marijuana waste or recalled products scheduled for return to grower/processors.

Haze of Grafton will utilize a point of sales system that supports real-time monitoring of inventory, along with sales totals and customer counts. These platforms allow authorized employees to track purchasing habits and accurately predict demand. The analysis of historical sales data and inventory trends will be effective for forecasting inventory needs.

Business management platform data and records will be stored electronically and be subject to electronic backup requirements. However, employees will be required to adhere to the same recordkeeping policies and procedures for printed, hand-written, or other analog records.

## **ACTIVE AND INACTIVE RECORDS / RETENTION PERIOD**

An active record is one that is needed for operations and is frequently used. An inactive record is not needed to operate the business and is preserved until the expiration of its retention period. Unless specifically exempted, all records will be deemed inactive 180 days after their last use.

Haze of Grafton applies an up to four (4)-year retention period to all electronic records including the video files from the surveillance cameras and the records of physical access controls (for example, the daily log showing which employees used their identification credentials to open which doors). At the conclusion of the retention period, Haze of Grafton will determine, on a case-by-case basis, whether certain categories of inactive records should be destroyed or preserved.

## **DIGITAL RECORDS**

Cannabis point of sale systems typically utilize proprietary programming and computer coding. The data records are stored in the cloud and are indecipherable without decoding.

At the conclusion of each business day, a dispensary manager downloads a daily report in a Portable Data File (.pdf) capturing all of the day's activities and operations, including all transactions with customers and vendors. Also, a dispensary manager will upload the daily report to the company's server, in a secure file that can only be accessed by either of the Executive Officers.

## **ACCESS CONTROL**

A dispensary employee's access to a point of sale system and dispensary records is defined by the employee's job function; this is commonly known as Role-Based Access Control. For instance, a customer-facing dispensary technician will have access to customer sales records; inventory managers will have access to inventory management records; security personnel will have access to visitor logs and stored surveillance system files.

Each employee, manager, and executive will have unique log-in credentials consisting of a unique username and password. Logs of users logging into the point of sale software will be archived to establish accountability records.

### **ADULT USE MARIJUANA PRODUCT INVENTORY RECORDS**

Haze of Grafton will create and maintain written and electronic records of all inventories and include the date of the inventory, a summary of findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory review. To ensure the proper management of inventory, all items that enter and leave company facilities will be tracked, monitored, and systematically arranged.

Through employee training, the company will create a thorough understanding of both the electronic tracking system and the business management platform. By preparing employees to input accurate data daily, Haze of Grafton can ensure the tracking system and business management platforms match and reflect the correct acquisitions, sales, waste and losses. Adult use marijuana products will be received and logged into the inventory point of sale system as a lot, batch, or grouping of products. The inventory will be placed into a product storage bin/container, and identified as back stock or ready-for-sale, active inventory. Only active inventory batches, lots, or groups will be used to fulfill orders from customers.

### **ADULT USE MARIJUANA INVENTORY AUDITING (ACTIVE INVENTORY)**

Sellable inventory will be divided into two (2) separate types: active inventory and back stock. Active inventory is the inventory that will be utilized to stock the sales floor. Back stock will be the items that remain static in storage until active inventory is depleted and requires restocking.

### **RECEIPT AND SALE OF ADULT USE MARIJUANA**

All adult use marijuana products will be tracked and monitored in the electronic tracking system and by physical inventory audits. Each activity associated with any adult use marijuana product will include a digital time, date, and location stamp within the Business Management Platform.

This timestamp will be used to produce a receipt that may be printed and made available to the CCC, law enforcement, and company management. Data reflected on platform receipts will also be used to produce transport manifests as required by. Included in auditing procedures is the accurate documentation of transportation dates, approximate times of departure/arrival, transport vehicle specification, delivery route information, and other data that may pertain to the successful tracking and monitoring of company inventory.

Inventory procedures include counting, storage, and facilitating of funds transferred to and from Haze of Grafton. Funds will be managed by employees trained to receive, deliver, count, sort, document, and securely store cash, checks, and other methods of payment. Money will be accounted for and recorded via multilevel auditing and secure accounting procedures. Funds will be counted and temporarily stored in lockable bank bags in the safe or vault area of the dispensary until the funds are safely transferred to the next individual, as defined in currency chain of custody procedures. Funds used for the purchase of adult use marijuana products will be linked to specific items, lots, and batches within our business management platform.

Haze of Grafton will select a cannabis point of sale system that will clearly demonstrate the exact products sold, the price of the items, methods of payment, and account details of other adult use marijuana organizations where funds were received or paid. Receipts of purchases and sales will be made readily available to adult use marijuana organizations, law enforcement officials, and the CCC. Receipts will be observed for their accurate reflection of the transfer of adult-use marijuana products and funds as part of daily sales and inventory reports.

## **RECORDKEEPING OF TRANSPORT**

Haze of Grafton will keep detailed records of all transport of adult use marijuana products, including:

- Transport Manifests;
- Receipts;
- Invoices;
- Bills of Lading;
- Shipping Invoices; and

- Packing Slips or any other shipping documents.

## **ACCOUNTING DATA**

Haze of Grafton is committed to the transparency of accounting data and adhering to Generally Accepted Accounting Principles (GAAP) in financial reporting. To achieve this goal, the company will hire an accountant or accounting company who will provide Haze of Grafton a wide range of tax, accounting, audit, business advisory, planning, payroll and support services to manage company financials and reporting.

All financial records will be maintained on secure, internal computer networks and will be duplicated using the electronic records backup system, ensuring Haze of Grafton will never experience a catastrophic loss of financial data.

The following business records shall be maintained within our accounting platform pursuant to 935 CMR 500:

- Assets & Liabilities
- Monetary transactions
- Books of accounts / Chart of accounts
- Sales records
- Salary and wages paid to each employee

## **APPROVED VENDORS**

Sourcing the most qualified and effective vendors to service all aspects of operations, especially facility security and equipment maintenance, is imperative to successfully serving the customers of the Commonwealth. Only owners, principals, and designated employees will be permitted to enter into business contracts on behalf of Haze of Grafton. They will be required to ensure vendors register with the company and are designated as an approved vendor by the Department, prior to providing goods or services. Completed vendor records, W-9 forms, and all other accounting records will be maintained by accounting personnel in compliance with IRS and any other regulatory requirements.

A list of approved vendors will be kept on site for easy reference by the Dispensary Manager and management personnel. This list will include, but is not limited to, the following vendor types:

- Marijuana Transport;
- Waste Disposal;
- Pest Management;
- Security System Service & Repair;
- Security Firm;
- IT Firm;
- Software Technical Support;
- Facility Services;

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## Energy Compliance Plan

Haze of Grafton, LLC will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Policies and procedures for energy efficiency and conservation include:

- Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
- Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.

S I M P L I C I T Y



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# Safety Plan for Manufacturing

## I. Introduction to Safety Plan

All members of Haze of Grafton, LLC processing team are Hazard Analysis and Critical Control Points (“HACCP”) certified and each kitchen team member is required to complete a ServSafe certification course and maintain the certification throughout the duration of his or her employment with Haze of Grafton].

The kitchen staff will prepare, handle, and store edible products in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments.

Haze of Grafton develops its recipes with appropriate dosing in mind and will take great care to ensure that when marijuana concentrate is added during the manufacturing of edible products that it is thoroughly homogenized throughout the entire batch and that individual doses are precisely measured.

Using its METRC seed-to-sale tracking system, Haze of Grafton will fastidiously maintain electronic records identifying the source of each cannabis based ingredient utilized in marijuana-infused products on a secure internal company drive. These records include the

vendor that supplied the ingredient, the date of receipt of the ingredients, the vendor number, and control number or any other identifying symbol used by the vendor.

To further ensure safety-controlled manufacture, Haze of Grafton has developed detailed HACCP plans for each product line manufactured in its kitchen, which are updated and maintained by the COO and/or Production Manager on a routine basis. In addition, Haze of Grafton's kitchen is designed to meet or exceed good manufacturing practices and health code standards for kitchens outlined in the FDA's Food Code and includes waterproof vinyl flooring, washable wall material, and dishwashing areas.

In addition to ServSafe training, each kitchen staff member undergoes a role-specific training program ranging from one to three weeks and at least eight hours of ongoing training each year.

## II. HACCP Plan

HACCP is a systematic preventive approach to food safety designed to control chemical, biological and physical hazards in production processes to safe levels. Haze of Grafton, LLC's HACCP Plan follows FDA and Massachusetts guidance for food safety programs. All standards in the plan are based on FDA and Massachusetts regulations for food manufacturers with wholesale distribution: 21 CFR; 105 CMR 500 and CCC regulations for production of Edible Marijuana Products: 935 CMR 501.150 & 935 CMR 501.130.

All Haze of Grafton employees are given an overview of HACCP principles as they relate to food production at Haze of Grafton's manufacturing facility in North Grafton. It is the responsibility of Production Managers and other supervisory staff to carry out these control measures and maintain Standard Operating Procedures ("SOPs") in order to ensure safe food production consistently. Kitchen activities are monitored and documented in physical and electronic recordkeeping logs. These will be regularly reviewed by Haze of Grafton's designated HACCP manager or trained designee in order to verify that the plan is working effectively as designed. Haze of Grafton's HACCP Plan and implementing SOPs are updated as processes, products, or facilities are altered, and additionally verified for efficacy.

## III. Emergency and Security Procedures

Time and temperature controls are critical to controlling bacteria outgrowth of potentially hazardous ingredients during the production and storage of edible MIPs. Refrigeration

temperatures are monitored throughout the day, and freezer temperatures are checked and recorded daily. Upon arrival or at any time during operational hours, if product temperatures are out of ideal range, or other hazards are identified at any stage of processing, corrective actions are implemented. Any issues and corrective actions are listed on the appropriate temperature and production logs.

Allergen control is also important in the production and distribution of safe, consistent ready-to-eat products. Haze of Grafton's dedicated Allergen Control SOP includes Good Manufacturing Practices for preventing cross-contamination, ensuring accurate labeling according to federal regulations, and all employees engaging in preparation of manufactured cannabis will take the SERVSAFE Massachusetts Allergen Training program. All MIPs are stored in secure, locked locations at all times prior to and during shipping, in accordance with state regulations.

## IV. Kitchen Staff Training

Kitchen staff training includes all SOPs contained in Haze of Grafton's overall HACCP plan including discussion of and procedures for guarding against pathogens of concern (including *Staphylococcus aureus* and Norovirus) in food processing operations. Staff are trained on risk based HACCP principles, including, but not limited to:

- A. Labeling methods;
- B. Date marking products;
- C. Storage temperatures;
- D. Time and temperature controls during food preparation;
- E. Illness policies, cleaning protocols and distribution strategies.

In addition, kitchen staff are trained on the following:

- SERVSAFE
  - Allergen training program
  - Food handler program
  - Food protection management
- MA Good Food protection training

Training is continuous and repeated with every change in process, recipe, and new employee onboarding.

## V. Kitchen Sanitary Practices

Kitchen equipment used in the production of marijuana products is cleaned between each use and at the conclusion of each shift by the kitchen staff. Cleaning procedures are guided by cleaning and sanitation standards established by the federal Occupational Safety and Health Administration (“OSHA”). Kitchen staff are responsible for daily cleaning and sterilization of the kitchen and equipment, as well as the proper disposal of and recordkeeping processes for waste generated in the kitchen.

“Deep cleaning” of the kitchen is conducted weekly by the kitchen staff and includes the cleaning and sterilization of all stoves, ovens, hoods/vents, scales, mixers, sinks, refrigerators, 3 steam kettles, tables, shelving, storage racks, walls, grease traps, dish-washing machines and floors. Kitchen staff are provided with training documents that include step-by-step instructions on the proper cleaning methods for each piece of equipment.

## VI. Kitchen Employee Hygiene Standards & Personal Protective Equipment (“PPE”)

Kitchen staff are required to wash their hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated. Instructions on proper handwashing techniques are provided to staff at the start of employment and posted throughout the Haze of Grafton facility, including within the kitchen area. Additionally, kitchen staff are required to shower within two hours before beginning their shifts.

Kitchen staff are required to change into a clean, company uniform or apron prior to entering the kitchen, and are required to wear non-slip shoes. Hair must be pulled back and covered with a hair net at all times. Beard coverings are required for any facial hair longer than an eyelash. No jewelry is permissible except a plain band on the finger and fingernails must be kept short and clean. Gloves must be worn when handling any ingredients or cannabis-containing products. Outside food or drinks are never permitted in the kitchen and must be stored in the break room to prevent cross-contamination.

## VII. Product Labeling and Packaging

Kitchen staff are responsible for accurate labeling, dosage accuracy and packaging controls to minimize the risk of misuse by Haze of Grafton customers. This label control and verification is intended to meet or exceed CCC guidelines. Haze of Grafton's Labeling and Packaging SOPs incorporate the minimum controls that are required to be implemented for edible marijuana products per 935 CMR 501.105(5) – Labeling of Marijuana and Marijuana Products. These controls will also assist in the unlikely event of a food recall or outbreak situation. Finally, the Labeling and Packaging SOPs also include protocols for traceability, product disposition and corrective actions if necessary.

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## **Restricting Access to age 21 and older**

Pursuant to 935 CMR 500.050(8)(b), Haze of Grafton, LLC (“Haze”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a Haze agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

In accordance with 935 CMR 500.110 (1) (a) and 935 CMR 500.105 (14), **NO** person may enter Haze of Grafton, LLC premises without first producing a valid, state or federal, photo ID.

In the event Haze discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). Haze will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Acceptable documentation is a valid driver’s license or passport with photo or photo

identification, showing date of birth issued by a governmental body; The employee will check the identification to ascertain that it is authentic. The manager should be informed if there is any appearance of forgery or tampering; In the absence of authentic identification, or in case of doubt, the employee will refuse service to the customer; It is the employee's responsibility to notify a manager and or supervisor immediately when a customer shows visible signs of intoxication; After refusing service to any customer, employees will note the name, appearance and clothing of the individual involved. The information will be given to the Dispensary Manager and logged appropriately for future reference; No employee will "freely dispense". All products will be dispensed in measured quantities.

Loitering, in accordance with 935 CMR 500.110 (1) (b) is not permitted under any circumstances. Any person suspected of loitering should be politely questioned by a member of staff and, if unable to credibly account for their presence, be asked to leave the vicinity. Should the person refuse, the matter should be elevated to the Operations Manager who may, if necessary, contact local law enforcement for assistance in removing the person from the facility.

SIMPLICITY



DISPENSARY

Haze of Grafton, LLC d/b/a Simplicity Dispensary

135 Westboro rd, North Grafton, MA 01536

## **Qualifications and training**

Haze of Grafton, LLC will ensure that all employees hired to work at a Haze of Grafton facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

### **Qualifications**

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth of Massachusetts 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.

Haze of Grafton will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Haze of Grafton discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and Haze of Grafton will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

## **Training**

Haze of Grafton, LLC shall ensure that all agents complete training prior to performing job functions. Training shall be tailored to:

- 1) The roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program.
- 2) At a minimum, staff shall receive eight hours of on-going training annually.
- 3) In terms of Responsible Vendor Training, on or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a “responsible vendor.”
- 4) Once a licensee is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire.
- 5) 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.”
- 6) Administrative employees who do not handle or sell marijuana may take the “responsible vendor” program on a voluntary basis.

As required by 935 CMR 500.105(2), and prior to performing job functions, each Haze of Grafton agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. A Haze of Grafton Agent will receive a minimum of eight (8) hours of training annually. A minimum of four (4) hours of training will be from the Responsible Vendor Training Program ("RVT") courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-Responsible Vendor Training may be conducted in-house by Haze of Grafton or by a third-party vendor engaged by the Haze of Grafton. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training. All Haze of Grafton Agents that are involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

## **Basic Core Curriculum**

Haze of Grafton's Agents must first take the Basic Core Curriculum within 30 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
  - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
  - The amount of time to feel impairment;
  - Visible signs of impairment; and
  - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
  - How to check identification;
  - Spotting and confiscating fraudulent identification;
  - Common mistakes made in identification verification.

- o Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Haze of Grafton Agents which shall include:
  - o Conduct of Haze of Grafton Agents;
  - o Permitting inspections by state and local licensing and enforcement authorities; Local and state licensing and enforcement, including registration and license sanctions;
  - o Incident and notification requirements;
  - o Administrative, civil, and criminal liability;
  - o Health and safety standards, including waste disposal;
  - o Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
  - o Permitted hours of sale;
  - o Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy;
  - o Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

Haze of Grafton will encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. Haze of Grafton records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each Haze of Grafton Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for Haze of Grafton to maintain designation as a Responsible Vendor.

# Roles and Responsibilities

## Chief Executive Officer

- Operate the organization according to direction provided by the Board of Directors.
- Facilitate an open communication system to support operations and administration of the Board by advising and informing its members.
- Report progress and statistical performance measures to the Board on a quarterly basis.
- Oversee all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hire qualified personnel for Executive Staff positions.
- Build and maintain a positive working relationship with Executive Staff and be open to suggestions for improvements from employees.
- Enforce adherence to legal guidelines and standard operating procedures to maintain the company's legal status and business ethics.
- Implement the Business Plan and make suggestions for its improvement.
- Set goals for performance and growth.
- Review financial and other reports to track business performance and devise methods for improvements.
- Build relations with key partners and stakeholders and act as a point of contact for investors.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Analyze problematic situations and occurrences and provide solutions to ensure company success and growth.
- Maintain a deep knowledge of the cannabis markets and industry
- Stay up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, Staffing and Training Plan - participating in conferences, and/or other means of networking with and learning from other management experts.

### Requirements:

- BA in business required
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices
- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

### **Chief Compliance Officer**

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components.
3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.

5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.

6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.

7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts. The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state's selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multitasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## **Chief Financial Officer**

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

1. Perform the day-to-day, monthly and year-end operations of the Accounting/ Finance Department.
2. Assist the CEO on all strategic and tactical matters as they relate to budget management, cost-benefit analysis, forecasting needs and the securing of new funding.
3. Manage the sales operation of the company through the supervision of a Sales Manager.
4. Foster a spirit of cooperation, respect and professionalism among employees and other executives.
5. Create financial reports such as P&L, Balance Sheet, Cash Flow and budget performance.
6. Present and interpret financial data for the Executive Staff and the Board of Directors.
7. Ensure compliance with applicable standards, rules, regulations, and systems of internal control.
8. Perform the processing and recording of accounts payable transactions.
9. Ensure that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
10. Manage the processing of cash receipts, recording of revenue and receivable.
11. Ensure that revenues and receivables are correct and maintained.
12. Prepare and record taxes for the company (Sales, Payroll, Local) and work with the CPA on Corporate taxes.
13. Perform the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, fixed assets depreciation and recording of adjusting and reclassification journal entries, if necessary.
14. Perform general accounts analysis and reconciliations, including bank statements, fixed assets, employer's benefit costs, accruals and prepaid expenses

15. In cooperation with the CCO and the ICM, ensure that the Point-of-Sale System is fully integrated into the Inventory Control System and be responsible for its accuracy and maintenance.
16. Stay up to date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other finance/accounting experts.

Requirements:

- At least 5 years of experience in accounting for a similar business size and a Bachelor's Degree in Business or Accounting, CPA preferred
- If less than 3 years of experience in sales, willingness to attend training related to managing sales personnel
- Expert knowledge in Quick Books
- Strong organizational skills and ability to prioritize workload in order to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization
- Ability to pass a background check

## **Security Manager**

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing Security Officers.

Responsibilities include, but are not limited to:

1. Implement and enforce safety regulations and policies.
2. Ensure the protection of people, property, and assets.
3. Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
4. Act as liaison to the local Police Department (PD).
5. Schedule all security services and officers.
6. Manage a budget covering security resources and employees.
7. Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
8. Administer the access control program, including the enrollment of personnel in the company's access control system.
9. Compile reports as required by the CCO.
10. Utilize all security systems to discover security breaches and identify compliance issues.
11. Train personnel according to established procedures and conduct regular security meetings to discuss problems and future plans.
12. Ensure the maintenance of training records and security logs.
13. Manage all visitor access to the facility.
14. Act as liaison to all departments on security measures, procedures, and needs.
15. If the company also carries out transportation responsibilities, Coordinate the security of transportation activities, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
16. Conduct security evaluations to ensure constant improvement and compliance.
17. Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
18. Ensure that all records are forwarded properly according to the Record Keeping Plan.

19. Foster a spirit of cooperation, respect and professionalism among employees and other managers.
20. Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

Requirements:

- Minimum of 1 year of Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Preferred but not required, board certified in security management by ASIS International as a CPP highly preferred
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

**Security Staff, Unarmed**

1. Unarmed Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.
2. Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
3. Maintain required records and logs.
4. Prevent access to any unauthorized persons within the registered premises

5. Assist any staff with security access issues.
6. Monitor any suspicious behavior by guests, visitors, or personnel.
7. Ensure compliance with state and local regulations and company procedures.
8. Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license is preferred
- Prior security, law enforcement or military experience preferred

### **Quality Assurance Officer**

The Quality Assurance Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.

Responsibilities include, but are not limited to:

1. Work closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
2. In departments that utilize mechanical equipment, work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation and inspection of each item.
3. Assist managers with employee training by preparing instructional materials, hands-on exercises and evaluation tools.
4. Complement training conducted by other managers by providing in-person training on issues related directly to quality control.
5. Foster a spirit of cooperation, respect and professionalism among employees and other executives.

6. Monitor the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
7. Maintain an awareness of regulations related to SOPs and product quality control.
8. Maintain an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
9. Work with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
10. Perform a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
11. Assist with regulatory inspections.
12. Implement procedures related to adverse events and recalls according to the Quality Assurance Plan.
13. Stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a Bachelor's degree in Quality Assurance from an accredited institution and 1 - 2 years of experience is preferred
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

## **Inventory Control Manager**

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the QAO, the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

1. Serve as the company expert on the state-required inventory control system (ICS) METRC and be aware of updates and compliance requirements related to the system
2. Act as the point of contact with the system vendor
3. Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO
4. Train incoming employees on the use of the ICS based on the requirements of his or her position
5. Foster a spirit of cooperation, respect and professionalism among employees and other managers
6. Maintain ICS training records and all other documentation and logs per regulations and procedures
7. Keep related equipment in good working condition and secured when not in use
8. Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
9. Carry out inventory verifications and report discrepancies
10. Resolve system notifications within a specified time period
11. Run reports from the ICS as requested

### Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system

- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

## **Computing Security Manager**

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

1. Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.
2. Monitor computing operations and infrastructure by reviewing alerts and logs on a daily basis. Ensure that security tools and technology are maintained and updated.
3. Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
4. Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
5. Foster a spirit of cooperation, respect and professionalism among employees and other managers.
6. Manage a budget related to computing resources.
7. Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
8. Audit internal security systems and policies frequently to identify areas needing improvement. Develop and maintain a detailed security incident response program.
9. Regularly report to the CCO on the status of computing security.
10. Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

**Sales Manager**

The Sales Manager reports to the CEO, CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

Responsibilities include, but are not limited to:

1. Work with the executive team to develop a sales/marketing strategy and identify potential customers.
2. Maintain vendor and client databases and relationships.
3. Attend and exhibit at trade shows.
4. Develop new business relationships in line with the company's strategy.
5. Gather related sales data, conduct analyses, and refine the strategy as needed.

6. Have a detailed understanding of inventory and prices.
7. Guide the marketing strategy based on vendor and consumer feedback.

### Requirements

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis/marijuana industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools
- Ability to pass a background check

### **Director of Production**

The Director of Production reports to the CEO and is responsible for the overall management of manufacturing activities.

Responsibilities include, but are not limited to:

1. Manage the budgets, overall supply chains, and operations of the manufacturing activities.
2. Implement the Manufacturing Plans, primarily through the hiring and supervision of the Manufacturing Managers.
3. Ensure product safety and work with other department heads to comply with regulations and required security, inventory control, and other procedures.
4. Prepare reports on production, expenses, product quality, safety, etc.
5. Analyze report results and prepare recommendations for improvements.
6. Present data to the other Executive Staff and to the Board of Directors as requested
7. Maintain inventory levels to ensure timely delivery of products to customers.

8. Research new technologies that may improve efficiency, safety, and productivity and make recommendations to Executive Staff.
9. Regularly meet with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures and ensure compliance with regulations.
10. Foster a spirit of cooperation, respect and professionalism among employees and other executives.
11. Stay up to date on manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other experts.

### Requirements

- A minimum of 3-5 years of experience in manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; Bachelor's degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both manufacturing; knowledge of the cannabis/marijuana industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

## **Facilities Manager**

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/marijuana waste management.

Responsibilities include, but are not limited to:

1. Maintain lighting, HVAC and mechanical systems in excellent working condition.
2. Coordinate with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
3. Manage a budget associated with facilities functions.
4. Hire, manage and train facilities staff.
5. Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
6. Be aware of federal, state and local regulations related to cannabis/marijuana business premises requirements.
7. Be familiar with local building code and permit regulations.
8. Develop a maintenance and inspection schedule for all building and infrastructure systems.
9. Conduct or oversee the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
10. Develop and maintain logs and checklists to simplify maintenance and inspection activities.
11. Schedule and facilitate required inspections by outside organizations.
12. Determine which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
13. Serve as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
14. Maintain an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
15. Work with the Security Manager to support the maintenance of security systems.
16. Manage chemicals, non-cannabis/marijuana waste and other refuse.

17. Train facilities employees in the proper procedures for handling and disposing of chemicals, including the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
18. Keep records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due
19. Forward all records and logs to the Record Keeping Manager
20. Become familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components
- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors Staffing and Training Plan - | 19
- Excellent organizational, planning and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

## **Record Keeping Manager**

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan. Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials

Work with the CCO to improve indexing or tagging categories to apply to each document

Scan paper records into the record management system on a daily or weekly basis

Delete or discard digital and paper records according to the company's record retention policy

Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age
- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new softwares within a relatively brief time period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

SIMPLICITY



DISPENSARY

**Haze of Grafton, LLC**  
**135 Westboro rd, North Grafton, MA, 01536**

# **Diversity Plan**

## **Statement of Purpose**

Haze of Grafton, LLC (“Haze of Grafton” or “the Company”) is committed to creating a diverse and inclusive workplace that provides opportunity and encourages participation in the legal cannabis industry by individuals of all backgrounds and particularly women and minorities. It is our belief that our company and marijuana establishment should reflect and celebrate the wide diversity of the Commonwealth of Massachusetts in general.

## **Goals**

In order for Haze of Grafton, LLC to promote equity for the above-listed groups in its operations and the cannabis industry in Massachusetts, the Company has established the following goals:

1. Hire and retain a diverse and inclusive group of employees, with the following specific staff percentage goals:
  - 50% women and 25% described as minorities (racial and ethnic diversity);
2. Create a safe, accepting and respectful work environment.

## **Programs**

Haze of Grafton, LLC has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- Create gender-neutral job descriptions;
- Hold a career fair at least once annually in the City of Worcester and encourage individuals with diverse backgrounds to apply for open positions. The career fair will be advertised in the Worcester Telegram & Gazette, on the Company's website, and through the Company's Instagram social media account.
- Advertise employment opportunities as they become available on DiversityJobs.com and in the Worcester Telegram & Gazette.
- One annual cultural sensitivity training for all employees, including specific training for employees in management positions.

## **Measurements**

The Company's management team will administer this Diversity Plan and will be responsible for developing measurable outcomes to ensure Haze of Grafton, LLC continues to meet its commitments. Such measurable outcomes, in accordance with Haze of Grafton's goals and programs described above, include:

- Conducting employment composition reviews to determine the percentage of employees from the above-listed groups, with the goal of achieving an employment composition that reflects diversity, including a target of at least 50% women, 25% minorities (racial and ethnic diversity).
- Documenting the number of employment opportunities posted on DiversityJobs.com and in the Worcester Telegram & Gazette, and the number of diverse individuals interviewed and hired as a result of these efforts.
- Haze of Grafton, LLC will collect and consider the feedback from the surveys and suggestion box with a goal of having at least 85% of our employees describe Haze of Grafton as a safe, accepting, and respectful work environment. All comments and feedback will be documented and reviewed by senior management staff.

Beginning upon receipt of the Commence operations, Haze of Grafton, LLC will utilize the proposed measurements to assess its Diversity Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The management team will review and evaluate Haze of Grafton, LLC's measurable outcomes no less than annually to ensure that the company is meeting its commitments. Haze of Grafton, LLC is mindful that the

demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

#### Acknowledgements

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