



## Massachusetts Cannabis Control Commission

### Marijuana Microbusiness

#### General Information:

License Number: MB282233  
Original Issued Date: 03/11/2022  
Issued Date: 03/11/2022  
Expiration Date: 03/11/2023

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Heart of Gold LLC

Phone Number: 508-948-8032  
Email Address: heartofgoldcannabisco@gmail.com

Business Address 1: 1141 Worcester Road  
Business City: New Braintree Business State: MA Business Zip Code: 01531  
Mailing Address 1: 1225 Worcester Road  
Mailing City: New Braintree Mailing State: MA Mailing Zip Code: 01531

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Woman-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?:  
no  
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: 51  
Role: Executive / Officer Other Role:  
First Name: Pamela Last Name: Perkins Suffix:

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity: New Braintree

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity: New Braintree

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

Specify Race or Ethnicity: New Braintree

Specify Race or Ethnicity: New Braintree

Person with Direct or Indirect Authority 2		
Percentage Of Ownership:	Percentage Of Control: 49	
Role: Executive / Officer	Other Role:	
First Name: Erik	Last Name: Perkins	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Decline to Answer		
Specify Race or Ethnicity:		

Percentage Of Ownership:	Percentage Of Control: 49	
Role: Executive / Officer	Other Role:	
First Name: Erik	Last Name: Perkins	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Decline to Answer		
Specify Race or Ethnicity:		

<b>Role:</b> Executive / Officer	<b>Other Role:</b>	
<b>First Name:</b> Erik	<b>Last Name:</b> Perkins	<b>Suffix:</b>
<b>Gender:</b> Male	<b>User Defined Gender:</b>	
<b>What is this person's race or ethnicity?:</b> Decline to Answer		
<b>Specify Race or Ethnicity:</b>		

First Name: Erik Last Name: Perkins Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Specify Race or Ethnicity:

**ENTITIES WITH DIRECT OR INDIRECT AUTHORITY**  
No records found

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

### CLOSE ASSOCIATES AND MEMBERS

No records found

**Close Associates and Members**  
No records found

**CAPITAL RESOURCES - INDIVIDUALS**  
**Individual Contributing Capital 1**

**First Name:** Pamela      **Last Name:** Perkins      **Suffix:**

**Types of Capital:** Monetary/Equity      **Other Type of Capital:**      **Total Value of the Capital Provided:** \$3000      **Percentage of Initial Capital:** 100

**Capital Attestation:** Yes

**Individual Contributing Capital 1**

<b>First Name:</b> Pamela	<b>Last Name:</b> Perkins	<b>Suffix:</b>	
<b>Types of Capital:</b> Monetary/Equity	<b>Other Type of Capital:</b>	<b>Total Value of the Capital Provided:</b> \$3000	<b>Percentage of Initial Capital:</b> 100
<b>Capital Attestation:</b> Yes			

<b>First Name:</b> Pamela	<b>Last Name:</b> Perkins	<b>Suffix:</b>	
<b>Types of Capital:</b> Monetary/Equity	<b>Other Type of Capital:</b>	<b>Total Value of the Capital Provided:</b> \$3000	<b>Percentage of Initial Capital:</b> 100
<b>Capital Attestation:</b> Yes			

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$3000 Percentage of Initial Capital: 100

Capital Attestation: Yes

Capital Attestation: Yes

**CAPITAL RESOURCES - ENTITIES**  
No records found

No records found

**BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES**  
No records found

No records found

**DISCLOSURE OF INDIVIDUAL INTERESTS**  
No records found

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS	
Cultivation Environment: Indoor	Establishment Activities: Both Cultivating and Manufacturing
Establishment Address 1: 1141 Worcester Road	
Establishment Address 2:	
Establishment City: New Braintree	Establishment Zip Code: 01531
Approximate square footage of the Establishment: 1000	How many abutters does this property have?: 3
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	

Cultivation Environment: Indoor	Establishment Activities: Both Cultivating and Manufacturing
Establishment Address 1: 1141 Worcester Road	
Establishment Address 2:	
Establishment City: New Braintree	Establishment Zip Code: 01531
Approximate square footage of the Establishment: 1000	How many abutters does this property have?: 3
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	

Establishment Address 1: 1141 Worcester Road

Establishment Address 2:

Establishment City: New Braintree                      Establishment Zip Code: 01531

Approximate square footage of the Establishment: 1000                      How many abutters does this property have?: 3

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

Establishment Address 2:

Establishment City: **New Braintree**                      Establishment Zip Code: **01531**

Approximate square footage of the Establishment: **1000**                      How many abutters does this property have?: **3**

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

Establishment City: **New Braintree**      Establishment Zip Code: **01531**

Approximate square footage of the Establishment: **1000**      How many abutters does this property have?: **3**

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

Approximate square footage of the Establishment: 1000      How many abutters does this property have?: 3

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

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 Signed.pdf	pdf	60b7e5fc5f6249360c0507a1	06/02/2021
Community Outreach Meeting	04.09.20_Form_COM_Attestation-signed	pdf	60b7f6ba70eb6e3601abe619	06/02/2021

Host Community Documentation:				
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Community Outreach Meeting	04.09.20_Form_COM_Attestation-signed	pdf	60b7f6ba70eb6e3601abe619	06/02/2021

Documentation	(1).pdf			
Plan to Remain Compliant with Local Zoning	Planning Board Application.pdf	pdf	60f6012f7a4b3b034a6830eb	07/19/2021
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	610d81e81cef2b37e5f4976f	08/06/2021
Community Outreach Meeting Documentation	Attachment C.pdf	pdf	610da67272db7037f432b770	08/06/2021
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	611804b3b6c7ee37de466cdf	08/14/2021
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Ordinances.pdf	pdf	61180cb01cef2b37e5f4c6e5	08/14/2021

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Heart of Gold LLC Plan to Positively Impact Areas of Disproportionate Impact.pdf	pdf	611d2114c618dd39aab55200	08/18/2021

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

##### Individual Background Information 1

Role: Owner / Partner Other Role: CFO Board Member  
First Name: Pamela Last Name: Perkins Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

##### Individual Background Information 2

Role: Executive / Officer Other Role: COO Board Member  
First Name: Erik Last Name: Perkins Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue -	MassTax Certificate of Good Standing.pdf	pdf	6043a04f40676f35abee1685	03/06/2021

Certificate of Good standing				
Secretary of Commonwealth - Certificate of Good Standing	State Good Standing.jpeg	jpeg	604781c3183b5235aa44ddae	03/09/2021
Articles of Organization	Heart of Gold LLC Articles of Organization.pdf	pdf	607b39423a37ef458c0870a0	04/17/2021
Bylaws	Heart of Gold Bylaws signed.jpeg	jpeg	607b424a5997354560765e7e	04/17/2021
Department of Revenue - Certificate of Good standing	Heart of Gold LLC Department of Unemployment Assistance Attestation.pdf	pdf	611808e08a09343989a1d635	08/14/2021

No documents uploaded

Massachusetts Business Identification Number: 001488050

Doing-Business-As Name:

DBA Registration City: New Braintree

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Heart of Gold LLC Business Plan.pdf	pdf	607b616521aec245a96cbb25	04/17/2021
Proposed Timeline	Heart of Gold LLC Timeline.pdf	pdf	607b619b03415644ba107cf8	04/17/2021
Plan for Liability Insurance	Heart of Gold LLC Plan to Obtain Liability Insurance.pdf	pdf	607b62877eb80444db4688c3	04/17/2021

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Dispensing procedures	Heart of Gold LLC Dispensing Procedures Plan.pdf	pdf	609e969ae54b280786bb2abb	05/14/2021
Energy Compliance Plan	Heart of Gold LLC Energy Use Plan.pdf	pdf	609e984bd91389075ed3b6e3	05/14/2021
Separating recreational from medical operations, if applicable	Heart of Gold LLC Plan for Separating Recreational from Medical Operations.pdf	pdf	609e99da8f80610756a145ab	05/14/2021
Plan to Obtain Marijuana	Heart of Gold LLC Plan to Obtain Marijuana.pdf	pdf	609e9a1fe54b280786bb2ada	05/14/2021
Prevention of diversion	Heart of Gold LLC Prevention of Diversion Plan.pdf	pdf	609e9a956f8420077bfc9570	05/14/2021
Qualifications and training	Heart of Gold LLC Qualifications and Training Plan.pdf	pdf	609e9b2068436d078d6b4b58	05/14/2021
Record Keeping procedures	Heart of Gold LLC Record Keeping Procedures.pdf	pdf	609e9bad3bbe600765b4f3f8	05/14/2021
Safety Plan for Manufacturing	Heart of Gold LLC Safety Plan for Manufacturing.pdf	pdf	609e9c0485675207abc7c184	05/14/2021
Security plan	Heart of Gold LLC Security Plan.pdf	pdf	609e9db2031c12076ccf4c8c	05/14/2021
Storage of marijuana	Heart of Gold LLC Storage of Marijuana	pdf	609e9de22e7a1d0770d0af82	05/14/2021

	Plan.pdf			
Transportation of marijuana	Heart of Gold LLC Transportation of Marijuana Plan.pdf	pdf	609e9e81b15b200795553ba0	05/14/2021
Inventory procedures	Heart of Gold LLC Inventory Procedures Plan.pdf	pdf	60f62cefd5a52e3026d4642e3	07/19/2021
Restricting Access to age 21 and older	Heart of Gold LLC Plan for Restricting Access to Age 21 and Older.pdf	pdf	60f6cae674b6080359f7303f	07/20/2021
Quality control and testing	Heart of Gold LLC Quality Control and Testing Plan.pdf	pdf	60f6d6518d6c3f02b7d1e08f	07/20/2021
Personnel policies including background checks	Heart of Gold LLC Personnel Policies Including Background Checks Plan.pdf	pdf	60f6eaf9504b25036f7591d5	07/20/2021
Maintaining of financial records	Heart of Gold LLC Plan for Maintaining Financial Records.pdf	pdf	60f6ee90ddf0e402a8710ef6	07/20/2021
Policies and procedures for cultivating	Heart of Gold LLC Policies and Procedures for Cultivating.pdf	pdf	60f71c0daa87100331f66ed7	07/20/2021
Types of products	Heart of Gold LLC Types of Products Plan.pdf	pdf	60f720b97a4b3b034a683483	07/20/2021
Production methods	Heart of Gold LLC Production Methods.pdf	pdf	60f7240f74b6080359f73325	07/20/2021
Sample of unique identifying marks for branding	Presentation1.pdf	pdf	60f7312c74b6080359f73371	07/20/2021
Diversity plan	Heart of Gold LLC Diversity Plan.pdf	pdf	611d21c9f4f37839b1f3323e	08/18/2021

## ATTESTATIONS

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

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

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

### Notification:

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

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

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

## ADDITIONAL INFORMATION NOTIFICATION

Notification:

## COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

#### HOURS OF OPERATION

<b>Monday From:</b> Open 24 Hours	<b>Monday To:</b> Open 24 Hours
<b>Tuesday From:</b> Open 24 Hours	<b>Tuesday To:</b> Open 24 Hours
<b>Wednesday From:</b> Open 24 Hours	<b>Wednesday To:</b> Open 24 Hours
<b>Thursday From:</b> Open 24 Hours	<b>Thursday To:</b> Open 24 Hours
<b>Friday From:</b> Open 24 Hours	<b>Friday To:</b> Open 24 Hours
<b>Saturday From:</b> Open 24 Hours	<b>Saturday To:</b> Open 24 Hours
<b>Sunday From:</b> Open 24 Hours	<b>Sunday To:</b> Open 24 Hours



# 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:

Heart of Gold LLC

2. Name of applicant's authorized representative:

Pamela Perkins

3. Signature of applicant's authorized representative:

*Pamela Perkins*

4. Name of municipality:

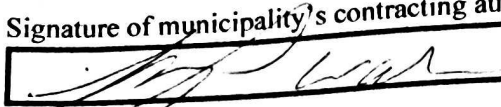
Town of New Braintree

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

Town of New Braintree / Randy Walker



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).*):

Selectboard@newbraintree.org

8. Host community agreement execution date:

April 12, 2021



# 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): 

4/12/21
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

3/29/21

b. Name of publication:

Worcester  
Telegram

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:

3/8/21

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:

3/30/21

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- The type(s) of ME or MTC to be located at the proposed address;
  - Information adequate to demonstrate that the location will be maintained securely;
  - Steps to be taken by the ME or MTC to prevent diversion to minors;
  - A plan by the ME or MTC to positively impact the community; and
  - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Heart of Gold LLC

Name of applicant's authorized representative:

Pamela Perkins

Signature of applicant's authorized representative:

*Pamela Perkins*



**New Braintree Planning Board**

**Special Permit Application  
Adult Marijuana Establishments**

**PART I APPLICANT INFORMATION**

Name(s): Pamela Perkins  
Address: 1225 Worcester Road  
Telephone #: 508-948-8032 Email: heartofgoldcannabisco@gmail.com

**PART II OWNER INFORMATION (If different than Applicant)**

Name(s): \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone #: \_\_\_\_\_ Email: \_\_\_\_\_

**PART III PROPERTY INFORMATION**

Address for which the Special Permit is requested: 1141 Worcester Road  
Town Assessor Map #: 406  
Area: 15 Frontage: 780'  
Deed Reference: Book 396 Page 106 Date 5/9/1974

**New Braintree Planning Board**

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**Special Permit Application  
Adult Marijuana Establishments**

**PART IV DESCRIPTION OF REQUEST**

**1. CHECK THE TYPE OF FACILITY REQUESTED, AS DEFINED IN THE ZONING BYLAW:**

- ☐ Craft Marijuana Cooperative
- ☐ Marijuana Cultivator
- ☐ Marijuana Product Manufacturer
- ☐ Marijuana Retailer
- ☐ Marijuana Independent Testing Laboratory
- ☒ Marijuana Microbusiness
- ☐ Marijuana Research Facility
- ☐ Marijuana Transporter

**2. Is the proposed Marijuana Establishment located on a parcel which is within five hundred (500) feet of any of the following (check if applicable):**

- ☐ A public or private school, preschool or kindergarten up to grade 12
- ☐ A public or private library
- ☐ Duly licensed daycare centers
- ☐ Churches, synagogues or other places of worship
- ☐ Public or private playgrounds

**3. Is the Marijuana Establishment proposed as an:**

- ☒ Enclosed facility, or
- ☐ Open Air facility

**New Braintree Planning Board**

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**Special Permit Application  
Adult Marijuana Establishments**

4. Do all proposed structures associated with the proposed Marijuana Establishment comply with the minimum setback of 100 feet as measured from the nearest edge of any public right-of-way or abutting property boundary and all other dimensional requirements of the New Braintree Zoning Bylaw, Section 4?  
☒ Yes      ☐ No
5. Does the total footprint of all proposed structures devoted to active cultivation of the proposed Marijuana Establishment, including greenhouse space, exceed 13,500 square feet of total area?  
☐ Yes      ☒ No
6. Do any proposed individual enclosed structures of the proposed Marijuana Establishment exceed 4,500 square feet?  
☐ Yes      ☒ No
7. Total square footage devoted to active cultivation of the proposed use: 441
8. Are any waivers being requested under Section F(j) of the Bylaw (please list and describe):

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**New Braintree Planning Board**


**Special Permit Application  
Adult Marijuana Establishments**

**PART V REQUIRED ATTACHMENTS**

- ☐ Filing Fee, check made payable to the Town of New Braintree (Amount to be determined)
- ☒ Executed Community Host Agreement
- ☐ Proof that the application to the Cannabis Control Commission has been deemed complete, or final permit from the Cannabis Control Commission
- ☒ Evidence that the Applicant has site control and right to use the site for a Marijuana Establishment facility in the form of a deed or valid purchase and sales agreement or, in the case of a lease a notarized statement from the property owner and a copy of the lease agreement
- ☒ Site Plan/Plot Plan
- ☒ Documentation of abutter notice
- ☒ Security Plan
- ☒ Odor Control Plan
- ☒ Management Plan
- ☒ Energy Use Plan
- ☒ Decommissioning Plan

**PART VI SIGNATURES**

I certify that all of the above are true to the best of my knowledge:

Owner Signature:  Date: 5/31/2021

Applicant Signature (if different): \_\_\_\_\_ Date: \_\_\_\_\_

## Attachment A

The below Community Outreach Notice was posted in the Worcester Telegram and Gazette:





Attachment C

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>[Redacted Address]</p> <p>51 Doten Road  Plymouth, MA 020 02360</p>		<p>B. Received by (Printed Name)</p>	<p>C. Date of Delivery  08/21/04</p>
<p>2. Article Number (Transfer from service label)  7018 3090 0001 0096 3139</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>9590 9402 6357 0296 6274 50</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail  <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

# SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



1120 Worcester Road  
New Braintree, MA 01531



9590 9402 6357 0296 6274 43

7018 3090 0001 0096 3085

PS Form 3811, July 2020 PSN 7530-02-000-9053

# COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

TW

☒ Agent

☐ Addressee

B. Received by (Printed Name)

COURT-19

C. Date of Delivery

5/27/21

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

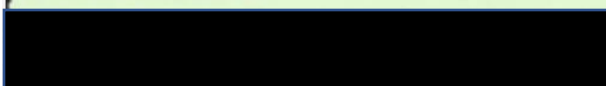
Mail Restricted Delivery

0)

Domestic Return Receipt

- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



1115 Worcester Road  
New Braintree, MA 01531



9590 9402 6357 0296 6274 36

7018 3090 0001 0096 3078

2.

PS Form 3811, July 2020 PSN 7530-02-000-9053

X

Received by (Printed Name)

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

(over 5000)

Domestic Return Receipt

## **Attachment B**

### **Community Outreach notification filed with the town clerk:**

#### **Heart of Gold Community Outreach Meeting**

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, April 12<sup>th</sup>, 2021 at 6:00 at 20 Memorial Drive, New Braintree MA. The proposed Microbusiness is anticipated to be located at 1141 Worcester Road, New Braintree, MA 0153. There will be an opportunity for the public to ask questions.



Heart of Gold  
Plan to Remain Compliant with Local Zoning

## Plan to Remain Compliant with Local Ordinances

The Town of New Braintree, Massachusetts regulates a Marijuana Establishment via a Special Permit Granting Authority. In accordance, Heart of Gold LLC shall ensure that it is compliant with local Special Permitting Granting Authority for its ME located at the physical address of 1141 Worcester Road, New Braintree, MA. The Town of New Braintree Special Permit licensing requires the following steps to be renewed on a yearly basis, which will be adhered to by Heart of Gold LLC:

- Application and filing fee of \$500.00 for an Adult-use Marijuana Establishment Special Permit which is to be submitted on a yearly basis.
- Yearly proof that the CCC application for licensing is complete, or final permit has been submitted.
- Type of ME facility including:
  - Craft Marijuana Cooperative, Marijuana Cultivator, Marijuana Product Manufacturer, Marijuana Retailer, Marijuana Independent Testing Laboratory, Marijuana Microbusiness, Marijuana Facility, Marijuana Transporter.
  - Enclosed facility or open-air facility
- Yearly site visit from the Town of New Braintree Planning Board to validate:
  - Assurance that the ME is not located within 500 feet of any of the following:
    - A public or private school, preschool or kindergarten up to grade 12
    - A public library
    - Duly licensed daycare center
    - Churches, synagogues or other places of worship
    - Public or private playgrounds
  - Assurance that the ME complies with minimum setback of 100 feet as measured from the nearest edge of any public right of way or abutting property boundary and all other dimensional requirements of the New Braintree Zoning Bylaw, Section 4.
  - Assurance that the total footprint of all proposed structures devoted to active cultivation of the ME, including greenhouse space, does not exceed 13,500 square feet of total area.
  - Assurance that no more than one Licensee and no more than one ME is located on the same parcel of land.
  - Identification of any required special waivers.
- Any updates to the existing following plans are submitted to the Special Permit Granting Authority on a yearly basis:
  - Site Plan/Plot Plan
  - Security Plan
  - Odor Control Plan
  - Management Plan
  - Decommissioning Plan

## **Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

## **Heart of Gold LLC's Plan to Positively Impact Areas of Disproportionate Impact**

Heart of Gold LLC shall strive to positively impact the following groups of disproportionately harmed people, as designated by the Commission:

1. Past or present residents of the geographic "areas of disproportionate impact," which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact. Note that some disproportionately impacted geographic locations are cities or towns, and others are neighborhoods identified by census tracts. The designation of these areas will be re-evaluated periodically.
2. Commission-designated Economic Empowerment Priority applicants
3. Commission-designated Social Equity Program participants
4. Massachusetts residents who have past drug convictions
5. Massachusetts residents with parents or spouses who have drug convictions

**Heart of Gold LLC Goals:** The goal will be to include 20% of its staff and 20% of its obtained services from the geographic areas of disproportionate impact Worcester, MA and Spencer, MA.

**Heart of Gold LLC Programs:** It shall strive to include 20% hiring and obtaining services from the geographic areas of disproportionate impacts Worcester, MA and Spencer, MA via word of mouth, employee referrals and advertising in areas that target Worcester, MA and Spencer MA.

To accomplish this particular goal, whenever Heart of Gold LLC requires additional employees or requires additional services, it shall post monthly advertisements in the local newspaper, The Worcester Telegram and Gazette, and the local community center Spencer Senior Center (<https://www.spencerma.gov/senior-center/pages/ongoing-events>) stating that the establishment is specifically looking for employees and/or services from the area of disproportionately impacted areas of Spencer, MA and Worcester, MA, and that employees and/or services must be for those 21 years or older.



**Heart of Gold LLC Metrics:** Heart of Gold, while starting as a small ME, shall benchmark the initial Agent demographics and shall strive to solicit employment and/or services from the geographic areas of disproportionate impacts, Worcester, MA and/or Spencer, MA, for a combined total of 20% employees and service providers from these towns.

Heart of Gold LLC will then evaluate on a quarterly basis the progress to comprise 20% of its employees and service providers from the disproportionately impacted geographic areas of Worcester, MA and Spencer, MA. If Heart of Gold LLC's program falls below its 20% goal, it will evaluate and improve the specific program instituted to meet the plan's goal. Heart of Gold LLC will also institute a process to benchmark, evaluate and improve the plan's success upon CCC Licensing renewal (one year from provisional licensure, and each year thereafter).

Upon renewal, Heart of Gold LLC will report detailed, demonstrative, and quantifiable proof of the establishment's efforts, progress, and success of its plan to positively impact disproportionately harmed people in the geographically areas of disproportionately harmed people in Worcester, MA and Spencer, MA for employment and/or services.

Heart of Gold 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 Marijuana Establishments.

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

The Heart of Goal plan for positive impact does not include any goals or programs that may be considered legal requirements under the Commission's regulations, state or federal law, or any contractual agreement such as a Host Community Agreement. (if applicable).





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

mass.gov/dor

Letter ID: L0511466816  
Notice Date: March 4, 2021  
Case ID: 0-001-105-282



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



HEART OF GOLD LLC  
1225 WORCESTER RD  
NEW BRAINTREE MA 01531-1854

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

The Commissioner of Revenue certifies that, as of the date of this certificate, HEART OF GOLD 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](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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



William Francis Galvin  
Secretary of the  
Commonwealth

March 3, 2021

TO WHOM IT MAY CONCERN:

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

**HEART OF GOLD LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on February 15, 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:  
**PAMELA PERKINS**

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

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

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

Secretary of the Commonwealth

*William Francis Galvin*



Processed By: TAA



**Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

**Articles of Organization**

Business Information, Articles of Organization, and Bylaws All applicants must demonstrate that their proposed business is registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity. Required items will include the following:

- Business name: Heart of Gold LLC
- Massachusetts Business Identification number: 86-2088059
- Bylaws (or the business' operating agreement in cases of limited liability companies or other applicable entity structure): None
- Doing-business-as names. Heart of Gold LLC
- Articles of Organization:

**Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

**Heart of Gold LLC Bylaws**

These Heart of Gold Bylaws are to adhere to licensing compliance with General Laws, Chapter 94G per Cannabis Control Commission as regulation 935 CMR 500.000 per The Commonwealth of Massachusetts.

**Article 1: Name**

- The name of this limited liability company shall be Heart of Gold LLC.
- Heart of Gold LLC is registered in the Commonwealth of Massachusetts.

**Article 2: Mission**

- Heart of Gold LLC is committed to providing the highest quality organic cannabis products not only within central Massachusetts, but also throughout the Commonwealth of Massachusetts.

**Article 3: Meetings**

- Monthly member meetings will be held at a place designated by the owner.

**Article 4: General matters**

- All authorized signatures will be handled by the owner.
- All contracts will be executed by the owner.

The undersigned hereby certifies that the foregoing is a true and correct copy of the Bylaws of the Limited Liability Corporation adopted as of 04/17/2021.

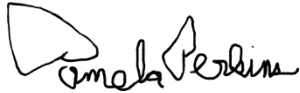


Pamela Perkins

Owner, Heart of Gold LLC

### Heart of Gold LLC Department of Unemployment Assistance Attestation

This document is an attestation that Heart of Gold LLC cannot provide a Certificate of Good Standing from the Department of Unemployment Assistance because Heart of Gold LLC is unable to obtain a Certificate of Good Standing from the department due to the fact that no employees have been hired.

A handwritten signature in black ink, appearing to read "Pamela Perkins". The signature is written in a cursive, flowing style.

Pamela Perkins

August, 14, 2021

# Heart of Gold LLC

## Business Plan

Prepared by Pamela Perkins

1141 Worcester Road

New Braintree, MA 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)



## **Index**

### **Executive Summary**

- Type of License
- Company Officers
- Highlights
- Mission Statement
- Code of Culture
- Objectives

### **Market Research**

- Market Analysis
- Market Segmentation
- SWOT

### **Financial Analysis**

- Short-term Projection
- Long-term Financial Projection



## **Executive Summary**

Business Name: Heart of Gold LLC

Also doing business as: Heart of Gold

Location: 1141 Worcester Road, New Braintree, MA 01531

EIN: 86-2088059

MBN: 282233

Mass ID: 001488050

### **Type of License: Microbusiness**

Heart of Gold LLC is seeking licensure from the Commonwealth of Massachusetts Cannabis Control Commission to produce revenue following the guidelines for a Cannabis Microbusiness including Tier 1 Cultivation, Cannabis Product Manufacturer and Delivery Endorsement.

- Tier 1 Marijuana Cultivator will produce no more than 5,000 square feet of canopy at any one time. The initial cultivation plan includes:  
Heart of Gold LLC will expand its cultivation production on location simultaneously with the initial cultivation plan.
- Cannabis Product Manufacturer including quality organic flower to use for extractions or edible products. Cannabis Microbusiness' may purchase no more than 2,000 pounds of Marijuana or its dry-weight equivalent in raw concentrate per year from other Marijuana Establishments, but not any other Marijuana Products.
- Delivery Endorsement if issued by the Commission, Heart of Gold LLC will deliver Marijuana or Marijuana Products produced at the licensed location directly to Consumers in compliance with established regulatory requirements for retail sale as it relates to delivery.

**Company Officers:**

- Pamela Perkins, Owner  
1225 Worcester Road, New Braintree, MA, 01531  
[Heartofgoldcannabisco@gmail.com](mailto:Heartofgoldcannabisco@gmail.com)  
Cell: 508-948-8032; Office 508-867-8668
- Erik Perkins, Operations Manager  
1225 Worcester Road, New Braintree, MA 01531  
[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)  
Cell: 508-873-1984

**Highlights**

Heart of Gold LLC will cultivate and distribute organic craft quality cannabis flower and other cannabis products. Our customers will be local retail dispensaries, cannabis product manufacturers and direct delivery for adult use.

**Mission Statement**

Heart of Gold LLC is committed to providing the highest quality organic cannabis products not only within central Massachusetts, but also throughout the Commonwealth of Massachusetts.

**Code of Culture**

Heart of Gold code is to be excellent stewards to the earth and its people. This includes utilizing organic cultivation and production methodologies, and sourcing local material whenever possible.

**Objectives**

Our objective is to offer an organic cannabis experience with better tasting and smelling products and also provide a healthier experience because there are no chemical treatments applied or consumed. Additionally, this will support a more sustainable environment by generating better soil structure, cleaner water and will promote biodiversity and reduce waste.





## **Market Research**

### **Market Analysis**

\$1.01B in Massachusetts cannabis sales since November 1<sup>st</sup>, 2018.

### **Market % of major cannabis product composition:**

Per CCC 2019 report, buds (flower) comprise the majority of sales (51%), followed by concentrates (19%), and edibles (17%) and infusions are listed as a new offering.

### **Product Category Descriptions** (as provided by Massachusetts seed-to-sale tracking system provider)

- **Buds by Weight:** The actual nuggets that a consumer grinds and smokes. Buds are the part of the cannabis plant that contain the cannabinoids including THC, CBD, CBG, and THCV.
- **Concentrate by Weight:** A concentrate is any type of cannabis product that is refined from flowers into a more purified and potent form. A concentrate can refer to any form of hash, kief, or hash oil (e.g. CO2, BHO, shatter, budder, wax).
- **Concentrate (Each)\* by Count:** (see above). The difference with this item category is that the data reporter can make this a count-based item. This is generally seen in prepackaged concentrates that are a standard weight that are easier to manage from an inventory perspective such as vaporizer cartridges.
- **Infused (edible) by Count:** Edibles are cannabis-infused products that are consumed orally. Common forms of edibles include baked goods (e.g. brownies and cookies) and candy (e.g. chocolate, gummies, and lollipops).
- **Infused (nonedible) by Count:** Cannabis-infused products that are not taken through oral consumption and digestion. This includes a range of products such as tinctures and transdermal patches.
- **Infused PreRolls by Weight:** Raw flower (ground bud or shake trim) cannabis that has been infused with a concentrate and rolled with cigarette paper or tobacco leaves prior to sale.
- **Raw Pre-Rolls by Weight:** Raw flower (ground bud or shake/trim) cannabis that was prepared by rolling in cigarette paper or tobacco leaves before its sale.
- **Kief by Weight:** Kief is a result of separating trichomes from the cannabis plant. Kief is a powdery substance that holds the most amounts of cannabinoids, making it potent and a very pure form of concentrate. Not typically sold to patients/consumers and is used primarily in Product Manufacturer licenses to produce concentrates.



- Shake/Trim by Weight: Shake is the excess cannabis product that is separated from the nuggets of bud during the packaging process. Trim is the excess snipping of leaves from buds of cannabis plants during the harvesting process. Shake/Trim is lower in potency and quality than buds and is typically used in the product manufacturing or producing pre-rolls to be sold to patients/consumers.
- Shake/Trim (by strain) by Weight (see above). The difference is this item category requires a strain to be associated with it.

\*After the study period, a new category was created for vaporizer cartridges and disposable pens. In the future, this will enable further stratification of concentrate categories to reflect vaporizer cartridge and pen sales. Currently, those items are tracked primarily under Concentrate (each); However, they also appear as Concentrate and Infused non-edible.

Potency: Laboratory results from a source product capture the potency of cannabis products by % THC: % CBD. Other results may capture potency by summing active THC and 0.877 times inactive THC (THC-A)/17–19.

### **Market Segmentation**

While the cannabis market includes Recreational and Medical Use, Heart of Gold LLC will supply the Recreational market only. The company will cater to the discerning cannabis users who seek out only the highest quality organic craft cannabis products.

### **Pricing**

Price Elasticity: Heavier users are more sensitive to cannabis price compared to lighter users and the quality of cannabis may also play a role in determining levels of price elasticity.

In Massachusetts, cannabis consumers pay a 6.25% sales tax and 10.75% excise tax. Additionally, municipalities have the option of adding up to a 3% local tax.

### **SWOT**

- Strengths includes an extremely knowledgeable organic cultivator and operations manager.
- Weaknesses includes the risk of unknown start-up costs.
- Objectives are to produce organically grown products so the consumer can enjoy healthy and socially compliant products.
- Threats includes the possibility of the lifting of Federal cannabis regulations that could inundate the market with large domestic and foreign companies that could out price smaller competitors.



## Financial Analysis

The Short-term Financial Projection is \$96,000 for a fully completed cycle of cultivation through sales.

The initial cultivation plan includes:

- 16 clones per light x 12 lights. Cycle runs for 84 Days (14 vegetative, 70 flower)
- 192 clones per cycle = 1oz. per clone = 192 oz. finished product per cycle
- $192/16 \text{ oz} = 12 \text{ lbs.} \times \$2,000 \text{ per lb.} = \$24,000 \text{ per 84-day cycle}$
- $\$24,000 \times 4 \text{ cycles per year} = \$96,000 \text{ annual net flower projection}$

Heart of Gold LLC will expand its cultivation production on location simultaneously with the initial cultivation plan.

The Long-term Financial Projection will be defined after the first full cycle of cultivation through sales has been completed. This is due to currently unknown capital and operational expenses, and startup costs.

**Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

**Heart of Gold LLC Plan to Obtain Liability Insurance**

In compliance with Cannabis Control Commission as regulation 935 CMR 500.000 per The Commonwealth of Massachusetts State Law, Heart of Gold LLC is submitting the following Plan to obtain Liability Insurance:

Heart of Gold is obtaining a quote from Charles River Insurance <https://www.charlesriverinsurance.com>, 5 Whittier St, Ste 4 Framingham, MA 01701-4691. This is to demonstrate in our plan that we will obtain, once licensed, a policy that shall include general liability and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually. The deductible for each policy will be no higher than \$5,000 per occurrence.

## **Heart of Gold LLC**

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[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Energy Use Plan**

In accordance as an adult-use ME under 935 CMR 500.000: Adult Use of Marijuana and 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators, Heart of Gold LLC will utilize Energy Use Plan and best practices as follows:

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

Heart of Gold LLC will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management, and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control as a condition of obtaining a final license under 935 CMR 500.103(2): Final License and as a condition of renewal under 935 CMR 500.103(4): Expiration and Renewal of Licensure. A Marijuana Cultivator shall adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable departments or divisions of the EOEEA, to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide energy and water usage reporting to the Commission in a form determined by the Commission. Each license renewal application under 935 CMR 500.103(4): Expiration and Renewal of Licensure shall include a report of the Marijuana Cultivator's energy and water usage over the 12-month period preceding the date of application. Marijuana Cultivators shall be subject to the following minimum energy efficiency and equipment standards:

(a) The building envelope for all facilities, except Greenhouses, shall meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code, except that facilities using existing buildings may



demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.

(B) Lighting used for Cannabis cultivation shall meet one of the following compliance requirements:

1. Horticulture Lighting Power Density may not exceed 36 watts per square foot, except for Tier 1 and Tier 2 which may not exceed 50 watts per square foot; or
2. All horticultural lighting used in a facility is listed on the current Design Lights Consortium Solid-state Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission as of the date of license application, and lighting Photosynthetic Photon Efficacy (PPE) is at least 15% above the minimum Horticultural QPL threshold rounded up to the nearest 0.1  $\mu\text{mol/J}$  (micromoles per joule).
3. A facility seeking to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission shall seek a waiver pursuant to 935 CMR 500.850: Waivers and provide documentation of third-party certification of the energy efficiency features of the proposed lighting. All facilities, regardless of compliance path, shall provide third-party safety certification by an OSHA NRTL or SCC-recognized body, which shall certify that products meet a set of safety requirements and standards deemed applicable to horticultural lighting products by that safety organization.

(c) Heating Ventilation and Air Condition (HVAC) and dehumidification systems shall meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR State Building Code), IECC Section C403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code). As part of the documentation required under 935 CMR 500.120(11)(b), a Marijuana Cultivator shall provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.

(d) Safety protocols shall be established and documented to protect workers, Consumers, or Visitors (e.g., eye protection near operating Horticultural Lighting Equipment).

(e) Requirements in 935 CMR 500.120(11)(b) and (c) shall not be required if an indoor Marijuana Cultivator is generating 80% or more of the total annual on-site energy use for all fuels (expressed on a MWh basis) from an onsite clean or renewable generating source, or renewable thermal generation, as provided in M.G.L. c. 25A § 11F and 11F½. Additionally, the Marijuana Establishment shall document that renewable energy credits or alternative energy credits representing the portion of the Licensee's energy usage not generated onsite have been purchased and retired on an annual basis.

(f) Prior to final licensure, a Marijuana Cultivator Licensee shall demonstrate compliance with 935 CMR 500.120(11), by submitting an energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation, together with submission of building plans under 935 CMR 500.103: Licensure and Renewal. For a Microbusiness or Craft Marijuana Cooperative with a cultivation location sized as Tier 1 or Tier 2, or such other Marijuana Cultivators that have been granted a waiver under 935 CMR 500.850: Waivers, compliance with any of the requirements of 935 CMR 500.120(11) may be demonstrated through an



energy compliance letter or updated energy compliance letter prepared by one or more of the following energy professionals:

1. A Certified Energy Auditor certified by the Association of Energy Engineers;
2. A Certified Energy Manager certified by the Association of Energy Engineers;
3. A Massachusetts Licensed Professional Engineer; or
4. A Massachusetts Licensed Registered Architect.

(g) A CMO with a final Certificate of Licensure issued before November 1, 2019 shall have until July 1, 2020 to comply with 935 CMR 500.120(11), except that any additions to or renovations to a facility shall comply with 935 CMR 500.120(11). A Marijuana Establishment subject to 935 CMR 500.120(11)(g) may apply for an additional six-month extension if it agrees to install meters to monitor energy usage, water usage and other data determined by the Commission as necessary in order to provide reports on energy usage, water usage, waste production and other data in a form and manner determined by the Commission.

(h) For purposes of 935 CMR 500.120(11), the following terms shall have the following meanings:

1. Horticultural Lighting Equipment (HLE) means any lighting equipment (e.g., fixtures, bulbs, ballasts, controls, etc.) that uses energy for the cultivation of plants, at any stage of growth (e.g., germination, cloning/Mother Plants, Propagation, Vegetation, Flowering, and harvest).
2. Horticulture Lighting Square Footage (HLSF) means Canopy.
3. Lighting Power Density (HLPD) means a measure of total watts of Horticultural Lighting Equipment per total Horticulture Lighting Square Footage,  $(HLE / HLSF = HLPD)$  expressed as number of watts per square foot.

**Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

**Heart of Gold LLC Plan for Separating Recreational from Medical Operations**

In compliance with 935 CMR 500.000, Adult Use of Marijuana, Heart of Gold LLC is submitting the following Plan for Separating Recreational from Medical Operations:

Heart of Gold LLC will not be cultivating, producing, testing nor dispensing Medical Marijuana and will in no means be involved in Medical Marijuana Operations. Therefore, Heart of Gold will not require a plan to separate Recreational from Medical Operations.



## **Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Qualifications and Training Plan**

In compliance with 935 CMR 500.000: Adult Use of Marijuana, Heart of Gold LLC is submitting the following Qualifications and Training Plan including:

- Marijuana Establishment Agent Training
- Responsible Vendor Training
- Basic Core Curriculum
- Advanced Core Curriculum
- Delivery Core Curriculum.

#### **Marijuana Establishment Agent Training**

Heart of Gold LLC shall ensure that all Marijuana Establishment Agents complete minimum training requirements prior to performing job functions.

At a minimum, Marijuana Establishment Agents shall receive a total of eight hours of training annually. The eight-hour total training requirement shall be tailored to the roles and responsibilities of the job function of each Marijuana Establishment Agent.

A minimum of four hours of training shall be from Responsible Vendor Training Program courses established under 935 CMR 500.105(2)(b). Any additional RVT hours over the four-hour RVT requirement may count toward the eight-hour total training requirement.

Non-RVT training may be conducted in-house by the Marijuana Establishment or by a third-party vendor engaged by the Marijuana Establishment. Basic on-the-job training Marijuana Establishments provide in the ordinary course of business may be counted toward the eight-hour total training requirement.

Agents responsible for tracking and entering product into the Seed-to-sale SOR shall receive training in a form and manner determined by the Commission. At a minimum, staff shall receive eight hours of on-going training annually.

Heart of Gold LLC will maintain records of compliance with all training requirements noted above. Such records shall be maintained for four years and Marijuana Establishments shall make such records available for inspection on request.

An individual who is both a Marijuana Establishment Agent and MTC Agent at a CMO location shall receive the training required for each license under which the agent is registered including, without limitation, with respect to patient privacy and confidentiality requirements, which may result in instances that would require such an agent to participate in more than eight hours of training.



**(b) Responsible Vendor Training.**

All current Marijuana Establishment Agents, including Laboratory Agents, involved in the handling or 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 Training Program to be designated a "Responsible Vendor".

- a. Marijuana Establishment Agents shall first take the Basic Core Curriculum.
- b. On completing the Basic Core Curriculum, a Marijuana Establishment Agent is eligible to take the Advanced Core Curriculum.
- c. Exception for Administrative Employees. Marijuana Establishment Agents who serve as administrative employees and do not handle or sell Marijuana are exempt from the four-hour RVT requirement but may take a Responsible Vendor Training Program course on a voluntary basis as part of fulfilling the eight-hour total training requirement.

Once a Marijuana Establishment is designated a Responsible Vendor, all Marijuana Establishment Agents employed by the Marijuana Establishment that are involved in the handling or sale of Marijuana for adult use shall successfully complete the Basic Core Curriculum within 90 days of hire.

After successful completion of the Basic Core Curriculum, each Marijuana Establishment Agent involved in the handling or sale of Marijuana for adult use shall fulfill the four-hour RVT requirement every year thereafter for the Marijuana Establishment to maintain designation as a Responsible Vendor. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

**Basic Core Curriculum.**

The Basic Core Curriculum shall cover the following subject matter:

- a. Marijuana's effect on the human body, including:
  - i. Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product
  - ii. The amount of time to feel impairment
  - iii. Visible signs of impairment; and
  - iv. Recognizing the signs of impairment
- b. Diversion prevention and prevention of sales to minors, including best practices.
- c. Compliance with all tracking requirements.
- d. Acceptable forms of identification. Training shall include:
  - i. How to check identification
  - ii. Spotting and confiscating fraudulent identification



- iii. Patient registration cards currently and validly issued by the Commission
  - iv. Common mistakes made in identification verification
  - v. Prohibited purchases and practices, including purchases by persons younger than 21 years of age in violation of M.G.L. c. 94G, § 13.
- e. Other key state laws and rules affecting Marijuana Establishment Agents, which shall include:
- i. Conduct of Marijuana Establishment Agents
  - ii. Permitting inspections by state and local licensing and enforcement authorities
  - iii. Local and state licensing and enforcement, including registration and license sanctions
  - iv. Incident and notification requirements
  - v. Administrative, civil, and criminal liability
  - vi. Health and safety standards, including waste disposal
  - vii. Patrons prohibited from bringing Marijuana and Marijuana Products onto licensed premises
  - viii. Permitted hours of sale
  - ix. Licensee responsibilities for activities occurring within licensed premises
  - x. Maintenance of records, including confidentiality and privacy
- f. Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

**Advanced Core Curriculum.**

- a. Each Advanced Core Curriculum class shall be approved by the Commission prior to being offered. The curriculum shall build on the knowledge, skills, and practices covered in the Basic Core Curriculum.
- b. An Advanced Core Curriculum class shall include standard and best practices in one or more of the following areas
  - i. Cultivation
  - ii. Product Manufacturing
  - iii. Retail
  - iv. Transportation
  - v. Social Consumption
  - vi. Laboratory Science
  - vii. Energy and Environmental Best Practices
  - viii. Social Justice and Economically Reparative Practices
  - ix. Implicit Bias and Diversity Training



- x. Worker Safety
- xi. Food Safety and Sanitation
- xii. Confidentiality and Privacy
- xiii. In depth coverage of any topic(s) taught in the Basic Core Curriculum; or
- xiv. Such other topic as the Commission may approve in its sole discretion.

### **Delivery Core Curriculum**

In addition to the Basic Core Curriculum, all Marijuana Establishment Agents acting as delivery employees of a Delivery Licensee or a Marijuana Establishment with a Delivery Endorsement shall have attended and successfully completed Delivery Core Curriculum prior to making a delivery, which shall, to the extent not covered in Basic Core Training include, without limitation, training on:

- a. Safely conducting deliveries
- b. Safe cash handling practices
- c. Strategies for de-escalating potentially dangerous situations
- d. Securing product following any instance of diversion, theft or loss of Finished Marijuana Products pursuant to 935 CMR 500.110(1)(m)
- e. Collecting and communicating information to assist in investigations
- f. Procedures for checking identification
- g. Indications of impairment
- h. Notification to Consumers of use of mandatory recording devices
- i. Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program

## **Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Record Keeping Procedures**

In compliance with 935 CMR 500.000, Adult Use of Marijuana, Heart of Gold LLC is submitting the following Record Keeping Procedures:

Heart of Gold LLC will maintain the following records:

- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)
- Records of this Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles.
- Written operating procedures as required by 935 CMR 500.105(1).
- Inventory records as required by 935 CMR 500.105(8).
- Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e).
- 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 Heart of Gold LLC employee. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
    - 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 8-hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.
- 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, supporting documents, agreements, checks, invoices, and vouchers; sales records including the quantity,



form, and cost of marijuana products; and salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

- Waste disposal records as required under 935 CMR 500.105(12).
- All records will be kept for at least 3 years after closure at the expense of this Marijuana Establishment and in a form and location acceptable to the Commission.

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[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Plan for Restricting Access to Age 21 and Older**

In compliance with 935 CMR 500.000, Adult use of Marijuana, and 935 CMR 500.101(1), Operating Policies and Procedures (Restricting Access to Individuals 21 or Older), Heart of Gold LLC will utilize the following Plan for Restricting Access to Age 21 and older, and ensuring all employees and registered agents must be 21 years of age or older, 935 CMR 500.029 or 500.030, including:

- Securing the Premises
- Consumer Age Verification for Delivery
- Prohibitive Labeling and Prohibiting Advertising to Minors

#### **Securing the Premises:**

- Securing all entrances to the Marijuana Establishment to prevent unauthorized access.
- Positively identifying individuals seeking access to the Premises of the Marijuana Establishment or to whom or Marijuana Products are being transported pursuant to 935 CMR 500.105(14): Access to the Commission, Emergency Responders and Law Enforcement to limit access solely to individuals 21 years of age or older.
- All recyclables and waste, including organic waste composed of or containing Finished Marijuana and Marijuana Products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on the Marijuana Establishment's Premises shall be locked and secured to prevent unauthorized access.

#### **Consumer Age Verification for Delivery**

(a) A Marijuana Retailer shall require any Consumer making a purchase for delivery by a Delivery Licensee or a Marijuana Establishment with a Delivery Endorsement to have the valid government-issued identification card a Consumer intends to use to verify her or his age at the time of delivery examined and authenticated by the Marijuana Retailer prior to the first Individual Order.

(b) Pre-verification of the Consumer's identification shall be performed prior to the initial delivery, by using one of the following Pre-verification methods:

1. In-person at the Marijuana Retailer's physical location or through a Commission approved electronic means and shall include examination of the Consumer's valid, unexpired government-issued photo identification that bears a date of birth in accordance with 935 CMR 500.140(2)(d). A Delivery



Licensee or Marijuana Establishment with a Delivery Endorsement is prohibited from performing a delivery to any Consumer who has not established an account for delivery through Pre-verification of the Consumer's government-issued identification card by the Marijuana Retailer; or

2. Through a Commission approved electronic means and shall include examination of the Consumer's valid, unexpired government-issued photo identification that bears a date of birth. A Marijuana Establishment with a Delivery Endorsement is prohibited from performing a delivery to any Consumer who has not established an account for delivery through Pre-verification of the Consumer's government-issued identification card.

(c) A Delivery Licensee or a Marijuana Establishment with a Delivery Endorsement may not deliver Delivery Items to any Person other than the Consumer who ordered the Delivery Items.

(d) A Delivery Licensee or a Marijuana Establishment with a Delivery Endorsement shall verify the age and identity of the Consumer at the time at which the Delivery Items are delivered to the Consumer at a Residence to ensure that Marijuana and Marijuana Products are not delivered to individuals younger than 21 years old. Prior to relinquishing custody of the Marijuana or Marijuana Products to the Consumer, the Marijuana Establishment Agent conducting the delivery shall verify that the government-issued identification card of the Consumer receiving the Marijuana or Marijuana Products matches the pre-verified government-issued identification card of the Consumer who placed the order for delivery by:

1. Viewing the government-issued identification as provided for Pre- verification under 935 CMR 500.145(3)(a);
2. Viewing proof of order generated at the time of order; and
3. Receiving the signature of the Consumer who ordered the Delivery Items and verifying that the signature matches the government-issued photo identification card presented.

#### **Prohibiting Advertising to Minors:**

- Use of medical symbols, images of Marijuana or Marijuana Products, or related Paraphernalia images, that are appealing to persons younger than 21 years old, and colloquial references to Marijuana and Cannabis are prohibited from use in the Brand Name
- Brand Name Sponsorship of a charitable, sporting or similar event, so long as the following conditions are met: Any advertising at or in connection with such an event is prohibited, unless such advertising is targeted to entrants or participants reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data, and reasonable safeguards have been employed to prohibit advertising from targeting or otherwise reaching entrants or participants reasonably expected to be under 21 years of age, as determined by reliable, current audience composition data;
- Brand Name Sponsorship of a charitable, cultural or similar event both held and organized by the city or town in which the sponsoring Marijuana Establishment or CMO is licensed to conduct business, so long as the following conditions are met: Any advertising at or in connection with such an event is prohibited, unless such advertising is targeted to entrants or participants





reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data, and reasonable safeguards have been employed to prohibit advertising from targeting or otherwise reaching entrants or participants reasonably expected to be under 21 years of age, as determined by reliable, current audience composition data.

**Prohibitive Labeling:**

(a) Labeling of Marijuana Not Sold as a Marijuana Product. Prior to Marijuana being sold or Transferred, a Marijuana Establishment 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 containing at a minimum the following information:

1. The name and registration number, telephone number and email address of the Licensee that produced the Marijuana, together with the retail Licensee's business telephone number, email address, and website information, if any;
2. The date that the Marijuana Establishment 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 US customary and 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 500.105(5)(a) shall not apply to Marijuana packaged for transport of wholesale cultivated Marijuana in compliance with 935 CMR 500.105(8): Inventory and Transfer, provided however, that the Marijuana Retailer is responsible for compliance with 935 CMR 500.105(5): Labeling of Marijuana and Marijuana Products for all Marijuana sold or displayed to Consumers.

(b) Labeling of Edibles. Prior to Edibles being sold or Transferred, the Marijuana Product Manufacturer 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, containing 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 US customary and metric units, listed in that order, of the Marijuana Product;
5. The number of servings within the Marijuana Product based on the limits provided in 935 CMR 500.150(3): Additional Labeling and Packaging Requirements for Edibles 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; and
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 500.105(5)(b) shall apply to Edibles produced by a Marijuana Product Manufacturer for transport to a Licensee in compliance with 935 CMR 500.105(8): Inventory and Transfer and shall be in addition to any regulation regarding the appearance of Edibles under 935 CMR 500.150: Edibles.

(c) Labeling of Marijuana Concentrates and Extracts. Prior to Marijuana concentrates or extracts being sold or Transferred, the Marijuana Product Manufacturer shall place a legible, firmly Affixed label on which the wording is no less than 1/16 of an inch in size on each Marijuana concentrate container that it prepares for retail sale or wholesale, containing 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. Product identity including the word "concentrate" or "extract" as applicable;
4. Total net weight of volume expressed in US customary units and metric units, listed in that order, of the Marijuana Product;
5. If applicable, the number of servings in the Marijuana Product based on the limits provided in 935 CMR 500.150(3): Additional Labeling and Packaging Requirements for Edibles 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, licensees 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 of testing in accordance with M.G.L. c. 94G, § 15;
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 500.105(5)(c) shall apply to Marijuana concentrates and extracts produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13): Transportation Between Marijuana Establishments.



(d) Labeling of Marijuana Infused Tinctures and Topicals. Prior to Marijuana infused Tinctures or topicals being sold or Transferred the Marijuana Product Manufacturer shall place a legible, firmly Affixed label on which the wording is no less than 1/16 of an inch in size on each container of Marijuana infused Tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

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 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 US customary units and metric units, listed in that order, of the Marijuana Product;
6. If applicable, the number of servings in the Marijuana Product based on the limits provided in 935 CMR 500.150(3): Additional Labeling and Packaging Requirements for Edibles 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; and
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 500.105(5)(d) shall apply to Marijuana-infused Tinctures and topicals produced by a Marijuana Product Manufacturer for transport to a Licensee in compliance with 935 CMR 500.105(8): Inventory and Transfer.
- (e) Labeling of Repackaged Marijuana. Prior to Repackaged Marijuana being sold, the Retailer shall place a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size on each container of Marijuana that it prepares for retail sale,
1. The Affixed label shall contain at a minimum the following information:
    - a. The name and registration number of the Cultivator that produced the Marijuana;
    - b. Business or trade name of licensee that packaged the product, if different from the Cultivator;
    - c. Date of Harvest;
    - d. Type of Marijuana or name of strain;
    - e. The full Cannabinoid Profile of the Marijuana contained within the Repackaged Product, including the amount of delta-nine-tetrahydrocannabinol ( $\Delta$ 9-THC) and other Cannabinoids in the package;
    - f. The net weight or volume as expressed in US customary units or metric units;
    - g. A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and Processing;
    - h. 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;



i. 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.”;

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



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



(f) In circumstances where the labeling of the Marijuana Product is unreasonable or impractical, the Marijuana Establishment may include the labeling information on a peel-back label or may place the product in a take-away bag with an insert or additional, easily readable label placed within that bag.

(g) CMOs shall comply with the labeling requirements in 935 CMR 500.105(5): Labeling of Marijuana and Marijuana Products for all adult-use sales and 935 CMR 501.105(5): Labeling of Marijuana and Marijuana Products for all medical-use sales.

(6) Packaging of Marijuana and Marijuana Products.

(a) Child-resistant Packaging. Licensees licensed subject to 935 CMR 500.050(4): Marijuana Product Manufacturer shall ensure that all Marijuana Products, other than those offered at wholesale by a Marijuana Cultivator, that are provided for sale to Consumers by a Licensee shall be sold in child-resistant packaging. To comply with 935 CMR 500.105(6): Packaging of Marijuana and Marijuana Products, Licensees shall ensure:





1. That to the extent it is not Unreasonably Impracticable for the specific type of product, Marijuana Products are packaged in containers that are:
  - 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; and
  - d. Certified by a qualified child-resistant packaging testing firm that the packaging complies with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.
2. That where compliance with the requirements of child-resistant packaging is deemed to be Unreasonably Impracticable, Marijuana or Marijuana Products shall be placed in an exit package that is:
  - a. Capable of being resealed and made child-resistant resistant again after it has been opened;
  - 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."; and
  - c. Is certified by a qualified third-party child-resistant packaging testing firm that the packaging complies the most recent poison prevention packaging regulations of the U.S. Consumer Product Safety Commission as included at 16 CFR 1700.
- (b) Limits on Packaging Design. Packaging for Marijuana or Marijuana Products sold or displayed for consumers, including any label or imprint affixed to any packaging containing Marijuana, Marijuana Products or any exit packages, may not be attractive minors. Packaging is explicitly prohibited from:
  1. Using bright colors, defined as colors that are "neon" in appearance;
  2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
  3. Featuring cartoons;
  4. Featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
  5. Featuring symbols or celebrities that are commonly used to market products to minors;
  6. Featuring images of minors; and
  7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

## **Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

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[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

## **Heart of Gold LLC Quality Control and Testing Procedures**

In compliance with 935 CMR 500.000: Adult use of Marijuana, and 500.160: Testing of Marijuana and Marijuana Products, Heart of Gold LLC is documenting the following Quality Control and Testing Procedures including:

- Testing Procedures
- Quality Control Samples
- Sanitary Requirements and Procedures

### **Testing Procedures**

(1) Heart of Gold LLC will allow no Marijuana Product, including Marijuana, to be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000: Adult Use of Marijuana. Testing of Marijuana Products shall 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 Marijuana and Marijuana Products. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission.

(2) Marijuana shall be tested for the Cannabinoid Profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant growth regulators, and the presence of Pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be additionally screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products.

(3) The Commission may, at its discretion, require additional testing where necessitated to safeguard the public health or public safety and so identified by the Commission.



(4) Heart of Gold LLC's written policy (this document) for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1).

(a) Includes:

1. Notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the Production Batch.
2. Notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission.

(b) The notification shall be from both Heart of Gold LLC and the Independent Testing Laboratory, separately and directly.

(c) The notification from Heart of Gold LLC shall describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

(5) Heart of Gold LLC shall maintain the results of all testing for no less than one year. Testing results shall be valid for a period of one year. Marijuana or Marijuana Products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, Transferred or otherwise conveyed until retested.

(6) The sale of seeds is not subject to these testing provisions.

(7) Clones are subject to these testing provisions but are exempt from testing for metals.

(8) All transportation of Marijuana to and from Independent Testing Laboratories providing Marijuana testing services shall comply with 935 CMR 500.105(13): Transportation Between Marijuana Establishments.

(9) All storage of Marijuana at a laboratory providing Marijuana testing services shall comply with 935 CMR 500.105(11): Storage Requirements.

(10) All excess Marijuana shall be disposed of in compliance with 935 CMR 500.105(12): Waste Disposal, either by the Independent Testing Laboratory returning excess Marijuana to Heart of Gold LLC for disposal or by the Independent Testing Laboratory disposing of it directly.



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

(12) Single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) shall be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

(13) If Heart of Gold LLC receives notice that Marijuana or a Marijuana Product that it has submitted for testing has failed any test for contaminants shall either reanalyze the Marijuana or Marijuana Product without remediation, take steps to remediate the identified contaminants, or dispose of the Marijuana or Marijuana Product.

(a) Reanalysis by a Second ITL. If Heart of Gold LLC chooses to reanalyze the sample, the same sample shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample representing the same sample set previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample shall have passed the Second Confirmatory Test at a second ITL. Any Marijuana and Marijuana product that fails the Second Confirmatory Test may not be sold, transferred or otherwise dispensed to consumers, patients or Licensees. Any such product shall be destroyed.

(b) Remediation. If Heart of Gold LLC chooses to remediate, a new test sample shall be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana product may be remediated a maximum of two times. Any Marijuana or Marijuana product that fails any test after the second remediation attempt may not be sold, transferred or otherwise dispensed to consumers, patients or Licensees. Any such product shall be destroyed.

(c) If Heart of Gold LLC chooses to dispose of the Marijuana or Marijuana Products, it shall do so in compliance with 935 CMR 500.105(12): Waste Disposal.

### **Quality Control Samples**

Heart of Gold LLC may utilize Quality Control Samples. These samples of Marijuana or Marijuana Product will be provided internally to employees or vendors for purposes of ensuring product quality and making determinations about whether to sell the Marijuana or Marijuana Product.

### **Vendor Samples**



Heart of Gold LLC may provide a Vendor Sample of a Marijuana Product to a Marijuana Retailer. Provision of a Vendor Sample under this subsection shall not be considered a prohibited practice under 935 CMR 500.105(4)(b)6.

Vendor Samples provided under this subsection:

1. May not be consumed on any licensed Premises
2. May not be sold to another licensee or Consumer
3. Shall be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products
4. Shall be transported in accordance with 935 CMR 500.105(13): Transportation Between Marijuana Establishments. Heart of Gold LLC may include Vendor Samples with other Marijuana Products intended for transportation to an individual Marijuana Retailer.

Vendor Sample limits. Heart of Gold LLC is limited to providing the following aggregate amounts of Vendor Samples to an individual Marijuana Retailer in a calendar month period:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(7), a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

(d) All Vendor Samples received from Heart of Gold LLC pursuant to 935 CMR 500.120(13): Vendor Samples that are used to manufacture a Marijuana Product shall be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Vendor Sample."

(e) All Vendor Samples provided by Heart of Gold LLC under 935 CMR 500.130(7) shall be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission and shall further be designated as "Vendor Sample."

(f) Vendor Samples provided under this section shall have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: "VENDOR SAMPLE NOT FOR RESALE"
2. The name and registration number of Heart of Gold LLC
3. The quantity, net weight, and type of Marijuana Product contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Vendor Sample that is traceable in the Seed-to-sale SOR.

#### Quality Control Samples

(a) Heart of Gold LLC may provide a Quality Control Sample of Marijuana Product to its employees for the purpose of ensuring product quality and determining whether to make the product available to sell. Provision of a Quality Control Sample under this subsection shall not be considered a prohibited practice under 935 CMR 500.105(4)(b)6.



- (b) Quality Control Samples provided to employees under this subsection:
1. May not be consumed on the licensed Premises
  2. May not be sold to another licensee or Consumer
  3. Shall be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products.
- (c) Quality Control Sample limits. Heart of Gold LLC is limited to providing the following aggregate amounts of Quality Control Samples to all employees in a calendar month period:
1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures
  2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations
  3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.
- (d) All Quality Control Samples provided under 935 CMR 500.130(8): Vendor Samples shall be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample."
- (e) Quality Control Samples provided under this subsection shall have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:
1. A statement that reads: "QUALITY CONTROL SAMPLE NOT FOR RESALE"
  2. The name and registration number of Heart of Gold LLC
  3. The quantity, net weight, and type of Marijuana flower contained within the package; and
  4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.
- (f) Upon providing a Quality Control Sample to an Employee, Heart of Gold LLC shall record:
1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample
  2. The date and time the Quality Control Sample was provided to the Employee
  3. The agent registration number of the employee receiving the Quality Control Sample; and
  4. The name of the Employee as it appears on their agent registration card.

### **Sanitary Requirements and Procedures**

Heart of Gold LLC will adhere to the following sanitary requirements and procedures surrounding quality control and testing procedures:

- Ensuring that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:
  - Well cured and generally free of seeds and stems



- Free of dirt, sand, debris, and other foreign matter
- Free of contamination by mold, rot, other fungus, and bacterial diseases
- Prepared and handled on food-grade stainless steel tables
- Packaged in a secure area. 935 CMR 500.105(3) (required for cultivators, product manufacturers, microbusiness, and craft marijuana cooperatives)
- All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000.
- Any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:
  - Maintaining adequate personal cleanliness
  - Washing hands appropriately. 935 CMR 500.105(3)
- Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands. 935 CMR 500.105(3).
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations. 935 CMR 500.105(3).
- Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests. t to 935 CMR 500.105(12). 935 CMR 500.105(3).
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair. 935 CMR 500.105(3).
- All contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. 935 CMR 500.105(3).
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana. 935 CMR 500.105(3).
- Water supply shall be sufficient for necessary operations. 935 CMR 500.105(3).
- Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. 935 CMR 500.105(3).
- The establishment shall provide its employees with adequate, readily accessible toilet facilities. 935 CMR 500.105(3).
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination. 935 CMR 500.105(3).
- No marijuana may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratory. 935 CMR 500.140(9).
- The establishment shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary. 935 CMR 500.160(2).

## **Heart of Gold LLC**

1141 Worcester Road, New Braintree MA, 01531

508-867-8668

[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Personnel Policies Including Background Checks**

In compliance with Cannabis Control Commission as regulation 935 CMR 500.000, Adult Use of Marijuana, Heart of Gold LLC is submitting the following Personnel Policies Including Background Checks Plan, including: Requirements and CORI Reports.

Heart of Gold LLC will ensure:

- Staffing plan and records are in compliance with 935 CMR 500.105(9). 935 CMR 500.105(1)
- Adherence to alcohol, smoke, and drug-free workplace policies per 935 CMR 500.105(1)
- Ensure confidential information will be maintained in accordance with 935 CMR 500.105(1)
- Utilization of a policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor. 935 CMR 500.105(1)

Heart of Gold LLC will apply for agent registrations for the following individuals: board members, directors, executives, managers, employees, and volunteers. For an individual to be deemed suitable for registration, they must be:

- (1) 21 years of age or older
- (2) never been convicted in the Commonwealth of distribution of controlled substances to minors or a like offense in another jurisdiction
- (3) be suitable for registration in accordance with 935 CMR 500.800 and 500.802.

#### **Requirements**

Heart of Gold LLC applicants must fill out an agent registration application for each individual as it pertains to a specific license. Heart of Gold LLC is applying for a Marijuana Microbusiness License, which shall include cultivation, production manufacturing and delivery. Heart of Gold Agents will only be permitted to perform those three functions: cultivation, production manufacturing and delivery.

Heart of Gold LLC will fill out an application for each individual that will act as its agent within the meaning of 935 CMR 500.030, and any other individuals previously included in the establishment's license application. Each application will have the following information:





- (1) individual's full name, address, date of birth
- (2) all aliases used previously or currently including maiden names
- (3) a copy of the applicant's driver's license or other government-issued ID
- (4) attestation that the individual will not engage in the diversion of marijuana products
- (5) written acknowledge by the individual of any limitations on his/her authorization to cultivate, harvest, prepare, package, possess, transport and dispense marijuana in the Commonwealth
- (6) background information including the following:
  - a. description and dates of any criminal action that occurred in any jurisdiction which resulted in a conviction, guilty plea, plea of nolo contendere, or admission of sufficient facts
  - b. description and dates of any civil or administrative action that occurred in any jurisdiction relating to any professional, occupational or fraudulent practices
  - c. description and dates of any past or pending action on a license that occurred or is occurring in any jurisdiction
  - d. description and dates of any past or pending disciplinary action or unresolved complaint that occurred or is occurring in any jurisdiction.
- (7) Nonrefundable application fee paid by the Heart of Gold LLC (\$50.00).

### **CORI Reports**

Heart of Gold LLC is required to obtain a Criminal Offender Record Information (CORI) report within 30 days prior to submission of an agent registration application. This information will be used to fill out the background check information for criminal actions on each applicant for each application. CORI reports do not need to be sent to the Commission unless specifically requested. CORI reports will be stored securely and kept confidential. CORI reports will be subject to review by Commission investigators on request.

CORI reports are only valid for one year from the date it was generated. New CORI reports will be obtained, for all required individuals, prior to the one-year anniversary of the last report that was generated.

### **CORI Waiver Ability**

Marijuana Establishment may request a waiver of the CORI report requirement in limited circumstances and with the submission of a signed waiver request form.<sup>5</sup> The Commission's consideration of a waiver request will be based on the following:

- (1) compliance with the CORI report requirement would cause undue hardship to the requestor



(2) the requestor's noncompliance would not jeopardize the health or safety of any patient or the public

(3) the requestor will institute compensating features acceptable to the Commission

Individuals listed on the establishment's application for licensure who were subject to a background check review in accordance with 935 CMR 500.101(1)(b) or 500.101(2)(c), are also subject to the CORI requirement in 935 CMR 500.030(3), and may also request a waiver according to the process outlined below.

A signed and notarized waiver request form is required to assess a waiver request. This request must be filled out, signed, and notarized by an individual with authority or control over the Marijuana Establishment. It must be uploaded within the application for agent registration. This request shall include the following:

(1) date of the last generated CORI report for the individual seeking registration as a marijuana establishment agent, which must be within the prior 365 days

(2) name of entity and individual who reviewed the last generated CORI report

(3) attestations by the Marijuana Establishment Representative for the following:

a. A new CORI check for the proposed agent per 935 CMR 500.030(3) would cause an undue hardship to the Marijuana

b. The last generated report was generated within the previous 365 days and that a new CORI report will be generated prior to the last report expiring

c. All required background check information on the CORI was reported in the agent registration application identified above

d. The last generated CORI report will be on file, securely and confidentially kept, for review by the Commission's investigators or agents on request

e. The individual attesting for the Marijuana Establishment reviewed the CORI report with the agent on a specific date and asked if there were any changes since that report. The agent did not report any changes since the issuance of the CORI report. The testing individual is not aware of any changes since the issuance of the CORI report that would implicate the suitability of the applicant within the meaning of 935 CMR 500.800, 500.802, and 500.803.

Waivers for agent registration CORI reports will be approved or denied administratively by the Chief of Investigations and Enforcement or his/her designee. If approved, a review of the agent registration application will occur, and the Marijuana Establishment will be notified regarding the status of the application when applicable. If the waiver is denied, a notice will be sent to the Marijuana Establishment with the reasons for the denial and directive to obtain a new CORI report by or before a certain date. Failure to obtain a CORI report by that date may result in the denial of the registration application.



### **Commission Review of Applications**

Agent registration applications will be reviewed after a Marijuana Establishment has been issued a notice of provisional licensure. If multiple provisional licenses are issued, agent registration applications will be reviewed in the order of the date of the issuance of the provisional license. Recommendations will be made to the Commission for agent registration approval or denial as a whole, whenever possible.

### **METRC & Agent Registration**

Further guidance and information will be forthcoming on the interplay between the registering of agents and their appearance and assignment within the METRC system, the Commission's electronic system of record for seed-to-sale tracking. However, once a Marijuana Establishment receives notice of provisional licensure and pays associated license fees, agent registration applications should be submitted for review and Commission consideration. Once approved, individuals associated with a license will be able to be viewed in the METRC system the following business day.

Once the license fee is paid and provisional licensure begins, METRC will contact the business with additional information regarding the seed-to-sale tracking system.

☐ A staffing plan and records in compliance with 935 CMR 500.105(9). 935 CMR 500.105(1)

☐ Alcohol, smoke, and drug-free workplace policies. 935 CMR 500.105(1)

☐ A plan describing how confidential information will be maintained. 935 CMR 500.105(1)

☐ A policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor. 935 CMR 500.105(1)

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[heartofgoldcannabisco@gmail.com](mailto:heartofgoldcannabisco@gmail.com)

### **Heart of Gold LLC Plan for Maintaining Financial Records**

In compliance with Cannabis Control Commission as regulation 935 CMR 500.000: Adult use of Marijuana, Heart of Gold LLC will utilize the following Maintenance of Financial Records Plan that substantially complies with the Commission's regulations. 935 CMR 500.101(1):

The following business records shall be maintained:

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

Additionally, Heart of Gold LLC has been recording current Operational and Capital expenditures using an Excel spreadsheet. These will be transferred to the accounting software QuickBooks Desktop once licensure has been secured from the Cannabis Control Commission. Heart of Gold LLC will utilize a cashless Point of Sales (POS) system such as virtual ATMs for retail sales made if a delivery endorsement is obtained.

Cadence for Maintaining Financial Records:

- Daily: Verify POS transactions align with METRX transactions and banking deposit activities.
- Weekly: Record transactions, Document and file receipts, Review unpaid bills from vendors, Pay vendors, Prepare and send invoices, review projected cash flow, Pay weekly payroll.
- Monthly: Balance business checkbook, Review past due receivables, Analyze inventory status, Process payroll and tax payments, Review P&L and Balance Sheet.
- Quarterly: Review sales tax and make payments, Compute and pay estimated tax
- Annually: Review past due receivables, Review inventory, Complete W-2 and 1099 forms, Review and approve year end financials for tax prep.

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## Heart of Gold LLC Diversity Plan

In compliance with 935 CMR 500.000: Adult Use of Marijuana, Heart of Gold LLC will utilize the following diversity plan:

Winning Together: At Heart of Gold LLC, we respect and value our differences and see a diverse and inclusive workforce as a strength.

To ensure Heart of Gold LLC maintains a diverse and inclusive workforce and to promote equity among women; minorities; veterans; people with disabilities; people who identify as LGBTQ+, our Diversity Plan includes the following goals, programs and measurements:

**Goals:** Heart of Gold LLC's diversity goals promote equity by providing everyone with the tools or opportunities they need to be successful:

1. Employee Goal: Heart of Gold LLC will strive to have an employee staff comprised of 60% women; 10% minorities; 10% veterans; 10% people with Disabilities; and 10% people who identify as LGBTQ+.
2. Service Provider Goal: Once Heart of Gold LLC will strive to have a service provider staff comprised of 60% women; 10% minorities; 10% veterans; 10% people with Disabilities; and 10% people who identify as LGBTQ+.

**Programs:** Programs that effectuate the goals of Heart of Gold LLC's Diversity Plan include the following:

1. As Heart of Gold is able to increase its staff, it will post monthly advertisements in the local newspaper, The Worcester Telegram and Gazette, and local community center, the Spencer Senior Center (<https://www.spencerma.gov/senior-center/pages/ongoing-events>) stating that the establishment is specifically looking to hire or obtain services from women; minorities; veterans; people with Disabilities; people who identify as LGBTQ+; and that employees and/or service providers must be 21 years or older.
2. Distributing internal workplace newsletter or memorandum on quarterly basis that encourages current employees to recommend women; minorities; veterans; people with Disabilities; people



who identify as LGBTQ+ as employees and/or service providers. Additionally, Heart of Gold LLC will ensure that it is communicated that employees and service providers must be 21 years or older.

**Measurements:** At the time of CCC Licensing approval, Heart of Gold LLC will benchmark the initial specific metrics below that will be used as a basis to assess the program progress:

1. Number of positions created since initial licensure.
2. Number of women; minorities; veterans; people with Disabilities; people who identify as LGBTQ+, who were hired and retained after the issuance of a license
3. Number of promotions for women; minorities; veterans; people with Disabilities; people who identify as LGBTQ+ since initial licensure.
4. Number of postings in diverse publications or general publications such as the Worcester Telegram and Gazette, with supporting documentation.
5. Number and supporting documentation of internal workplace newsletters or memorandum that encourage current employees to recommend women; minorities; veterans; people with Disabilities; people who identify as LGBTQ+ for employment or to attract, contract, hire, promote, and retain board members, contractors, executives, employees, managers, and service providers.

Heart of Gold LLC will then evaluate on a quarterly basis the progress made to comprise a staff of employees and service providers that are comprised of 60% women; 10% minorities; 10% veterans; 10% people with Disabilities; and 10% people who identify as LGBTQ+.

If Heart of Gold LLC's program falls below its program goals, it will evaluate and improve the specific program instituted to meet the diversity plan's goal. Heart of Gold LLC will also institute a process to benchmark, evaluate and improve the Diversity Plan's success upon CCC Licensing renewal (one year from provisional licensure, and each year thereafter).

Heart of Gold LLC acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every ME.

Additionally, Heart of Gold LLC acknowledges and is aware 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.