



# Massachusetts Cannabis Control Commission

## Marijuana Product Manufacturer

### General Information:

License Number: MP282172  
Original Issued Date: 04/26/2023  
Issued Date: 04/26/2023  
Expiration Date: 04/26/2024

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: J-B.A.M., Inc

Phone Number: 860-402-0605      Email Address: monique@j-bam.net

Business Address 1: 71 DOWNING PKWY BLDG A      Business Address 2:

Business City: Pittsfield      Business State: MA      Business Zip Code: 01021

Mailing Address 1: PO Box 311      Mailing Address 2:

Mailing City: East Otis      Mailing State: MA      Mailing Zip Code: 01029

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

## PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

## RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 51      Percentage Of Control: 34

Role: Owner / Partner      Other Role:

First Name: Brian      Last Name: Palazzi      Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 25 Percentage Of Control: 33

Role: Owner / Partner Other Role:

First Name: Anthony Last Name: Palazzi Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Some Other Race or Ethnicity

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 24 Percentage Of Control: 33

Role: Owner / Partner Other Role:

First Name: Monique Last Name: Palazzi Suffix:

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: J-B.A.M., Inc Entity DBA:

Email: monique@jbbam.net Phone: 860-402-0605

Address 1: 71 Downing Parkway Building A Address 2:

City: Pittsfield State: MA Zip Code: 01029

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$29964.21 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Brian Last Name: Palazzi Suffix:

Marijuana Establishment Name: J-B.A.M., Inc Business Type: Marijuana Cultivator

Marijuana Establishment City: Pittsfield Marijuana Establishment State: MA

Individual 2

First Name: Monique Last Name: Palazzi Suffix:

**Marijuana Establishment Name:** J-B.A.M., Inc      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Pittsfield      **Marijuana Establishment State:** MA

**Individual 3**

**First Name:** Anthony      **Last Name:** Palazzi      **Suffix:**  
**Marijuana Establishment Name:** J-B.A.M, Inc      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Pittsfield      **Marijuana Establishment State:** MA

**MARIJUANA ESTABLISHMENT PROPERTY DETAILS**

**Establishment Address 1:** 71 Downing Parkway Building A  
**Establishment Address 2:**  
**Establishment City:** Pittsfield      **Establishment Zip Code:** 02101  
**Approximate square footage of the Establishment:** 16000      **How many abutters does this property have?:** 8  
**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 JBAM.pdf	pdf	61fc1787ea0b000858e8ab13	02/03/2022
Community Outreach Meeting Documentation	JBAM COM Documentation.pdf	pdf	61fc1992dc96b108e5519aae	02/03/2022
Plan to Remain Compliant with Local Zoning	JBAM Zoning Compliance Plan.pdf	pdf	61fc1c98f2351e085f728c36	02/03/2022
Community Outreach Meeting Documentation	JBAM Attendees.pdf	pdf	620ec090e95b8c088881b9fe	02/17/2022
Community Outreach Meeting Documentation	JBAM meeting upload.pdf	pdf	620ec09c7c2bdd089a1fa2d6	02/17/2022

**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	PIP 2.2 JBAM.pdf	pdf	622a423317ef97077a76902c	03/10/2022

**ADDITIONAL INFORMATION NOTIFICATION**

**Notification:**

**INDIVIDUAL BACKGROUND INFORMATION**

Individual Background Information 1

**Role:** Owner / Partner      **Other Role:**  
**First Name:** Brian      **Last Name:** Palazzi      **Suffix:**  
**RMD Association:** Not associated with an RMD

Background Question: no

### Individual Background Information 2

Role: Manager Other Role:  
First Name: Anthony Last Name: Palazzi Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

### Individual Background Information 3

Role: Owner / Partner Other Role:  
First Name: Monique Last Name: Palazzi Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

### ENTITY BACKGROUND CHECK INFORMATION

#### Entity Background Check Information 1

Role: Investor/Contributor Other Role:  
Entity Legal Name: J-B.A.M., Inc Entity DBA:  
Entity Description: Current cannabis cultivation licensee that PM license would be associated with  
Phone: 413-347-8034 Email: monique@j-bam.net  
Primary Business Address 1: 71 Downing Parkway Building A Primary Business Address 2:  
Primary Business City: Pittsfield Primary Business State: MA Principal Business Zip Code:  
01201

Additional Information:

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	J-BAM Articles.pdf	pdf	61fc26168dbcc3090663d221	02/03/2022
Articles of Organization	JBAM Supplemental Articles.pdf	pdf	61fc261edc96b108e5519b73	02/03/2022
Bylaws	By-Laws - J - B.A.M., Inc. (00789694xD3E6F).pdf	pdf	61fc263ed04772090d5a3e31	02/03/2022
Bylaws	First Amendment to the By-Laws of J-BAM v1.2.pdf	pdf	61fc266cd3dbc608cffa6b1b	02/03/2022
Secretary of Commonwealth - Certificate of Good Standing	COGS Corp.pdf	pdf	61fc26b2f2351e085f728ca8	02/03/2022
Department of Revenue - Certificate of Good standing	COGS Tax.pdf	pdf	61fc26ba5099080851f37905	02/03/2022
Department of Revenue - Certificate of Good standing	Certificate of Compliance 22193516.pdf	pdf	620ec12e25efbc0893016504	02/17/2022

No documents uploaded

Massachusetts Business Identification Number: 001383727

Doing-Business-As Name:

DBA Registration City: Not Applicable

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	J-B.A.M. COI.pdf	pdf	61fc26e2a828d708f051152e	02/03/2022
Business Plan	JBAM Business Plan Manufacturing.pdf	pdf	61fc292025efbc08930115ab	02/03/2022
Proposed Timeline	JBAM Timeline.pdf	pdf	61fc29d025efbc08930115c2	02/03/2022

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Sample of unique identifying marks used for branding	JBAM Logo.pdf	pdf	61fc304adc96b108e5519bf1	02/03/2022
Restricting Access to age 21 and older	Policy for Restricting Access to Age 21 and Older.pdf	pdf	61fc30aaea0b000858e8ac60	02/03/2022
Security plan	JBAM Security Plan 2.0.pdf	pdf	61fc3104e95b8c0888816a95	02/03/2022
Prevention of diversion	J-BAM Prevention of Diversion SOP.pdf	pdf	61fc3146879c73091c817ce6	02/03/2022
Storage of marijuana	JBAM Storage Manufacturing SOP.pdf	pdf	61fc320c25efbc0893011617	02/03/2022
Transportation of marijuana	JBAM Transportation of Marijuana SOP.pdf	pdf	61fc3239ea0b000858e8ac72	02/03/2022
Inventory procedures	JBAM Inventory and Tracking SOP 2.0.pdf	pdf	61fc3331dc96b108e5519c1d	02/03/2022
Quality control and testing	JBAM Quality Control and Product Testing 2.0.pdf	pdf	61fc33f6ea0b000858e8ac8e	02/03/2022
Dispensing procedures	JBAM Dispensing SOP.pdf	pdf	61fc36f9f2351e085f728d79	02/03/2022
Personnel policies including background checks	JBAM Personnel Policies including Background Checks.pdf	pdf	61fc373e35cb3e08f721ed5a	02/03/2022
Record Keeping procedures	JBAM Record Keeping Procedure.pdf	pdf	61fc375d25efbc0893011667	02/03/2022
Maintaining of financial records	JBAM Maintenance of Financial Records SOP.pdf	pdf	61fc37797c2bdd089a1f545f	02/03/2022
Qualifications and training	JBAM Qualifications and Training SOP 2.0.pdf	pdf	61fc3b1cdc96b108e5519c94	02/03/2022
Energy Compliance Plan	JBAM Energy Efficiency Plan MFG.pdf	pdf	61fc3bdfa828d708f0511658	02/03/2022
Safety Plan for Manufacturing	JBAM Safety Plan.pdf	pdf	61fc3c1bea5b88086e771098	02/03/2022
Plan to Obtain Marijuana	Plan to obtain Marijuana.pdf	pdf	61fc3c8b71cb790879590749	02/03/2022
Diversity plan	J-BAM Diversity Plan 2.2.pdf	pdf	620ec2caea5b88086e775edd	02/17/2022
Types of products Manufactured.	Types of Products to be manufactured.pdf	pdf	620ec416879c73091c81cb80	02/17/2022
Method used to produce products	Methods used to produce products 2.0.pdf	pdf	620ec6b9e95b8c088881ba1d	02/17/2022
Diversity plan	Diversity Plan 2.3.pdf	pdf	621e7dfc6670b20768e7b196	03/01/2022

**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**

Monday From: 7:00 AM	Monday To: 7:00 PM
Tuesday From: 7:00 AM	Tuesday To: 7:00 PM
Wednesday From: 7:00 AM	Wednesday To: 7:00 PM
Thursday From: 7:00 AM	Thursday To: 7:00 PM
Friday From: 7:00 AM	Friday To: 7:00 PM
Saturday From: 7:00 AM	Saturday To: 7:00 PM
Sunday From: 7:00 AM	Sunday To: 7:00 PM



# Host Community Agreement Certification Form

## Instructions

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

## Certification

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

1. Name of applicant:

J-B.A.M., Inc

2. Name of applicant’s authorized representative:

James McMahon

3. Signature of applicant’s authorized representative:

DocuSigned by:  
*James McMahon*

7516EBA179774DD

4. Name of municipality:

Pittsfield

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

Linda M. Tyrer



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

Linda M. Jager

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).*):

mayorsoffice@cityofpittsfield.org

8. Host community agreement execution date:

11/19/19





# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

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



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

- a. Date of publication:
- b. Name of publication:

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

- a. Date notice filed:

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

- a. Date notice(s) mailed:

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

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



Name of applicant:

J-B.A.M., Inc

Name of applicant's authorized representative:

James McMahon

Signature of applicant's authorized representative:

DocuSigned by:

*James McMahon*

7516EBA179774DD...





Tuesday, January 11, 2022

BerkshireEagle.com | The Berkshire Eagle

CLASSIFIEDS

B5

# Berkshire County Classifieds



To advertise call 413-496-6365 or email  
classifieds@newenglandnewspapers.com

The Berkshire Eagle

## Public Notices

(SEAL)  
**COMMONWEALTH OF MASSACHUSETTS  
LAND COURT  
DEPARTMENT OF THE TRIAL COURT**

Docket No. 21\_SM\_001748

### ORDER OF NOTICE

TO:  
Ann L. Filiault a/k/a Ann Louise Filiault, Individually and as Personal Representative of the Estate of Janet B. Filiault, Linda Serapilio a/k/a Linda Marie Filiault and to all persons entitled to the benefit of the Servicemembers Civil Relief Act, 50 U.S.C. c. 50 §3901 (et seq);  
**Bank of New York Mellon Trust Company, N.A. as Trustee for Mortgage Assets Management Series I Trust** claiming to have an interest in a Mortgage covering real property in Williamstown, numbered 716 Simonds Road, given by Edward A. Filiault and Janet B. Filiault to Financial Freedom Senior Funding Corporation, dated September 14, 2007, and recorded in Berkshire County (Northern District) Registry of Deeds in Book 1308, Page 284, and now held by the Plaintiff by assignment, has/have filed with this court a complaint for determination of Defendant's/Defendants' Servicemembers status.

If you now are, or recently have been, in the active military service of the United States of America, then you may be entitled to the benefits of the Servicemembers Civil Relief Act. If you object to a foreclosure of the above-mentioned property on that basis, then you or your attorney must file a written appearance and answer in this court at **Three Pemberton Square, Boston, MA 02108** on or before **02/14/2022** or you may lose the opportunity to challenge the foreclosure on the ground of noncompliance with the Act.

Witness, GORDON H. PIPER Chief Justice of this Court on 12/29/2021.

Attest:  
Deborah J. Patterson,  
Recorder

AD# 62867  
01/11/2022

## CITY OF NORTH ADAMS, MASSACHUSETTS Conservation Commission

### LEGAL NOTICE Tuesday, January 18, 2022

The North Adams Conservation Commission will hold a public hearing pursuant to M.G.L. Chapter 131, Section 40, Wetlands Protection Act on Tuesday, January 18, 2022 at 6:00 p.m., via recorded teleconference at:  
<https://us02web.zoom.us/j/81127076825?pwd=WUJPNllna1VhS3c5NHh2ZW04dkEyZz09>  
passcode: 870847.  
Additional call in numbers can be found at:  
<https://www.northadams-ma.gov/calendar.php>.

• A Notice of Intent submitted by Tighe & Bond on behalf of City of North Adams for property located at 111 River Street for the removal of hazardous materials, subsurface soils, and the demolition of an existing 1,800 square foot structure.

Jason Moran, Chairman  
North Adams Conservation Commission  
Berkshire Eagle publication date: January 11, 2022

AD# 62752  
01/11/2022

## Commonwealth of Massachusetts The Trial Court Probate and Family Court Berkshire Probate and Family Court 44 Bank Row Pittsfield, MA 01201 (413)442-6941

### CITATION ON PETITION TO CHANGE NAME

Docket No. BE21C0125CA

In the matter of:  
Henry Joseph Fuore

A Petition to Change Name of Adult has been filed by **Henry Joseph Fuore** of New Marlborough MA requesting that the court enter a Decree changing their name to: **Henry Joseph Lipsky**

### IMPORTANT NOTICE

Any person may appear for purposes of objecting to the petition by filing an appearance at: **Berkshire Probate and Family Court before 10:00 a.m. on the return day of 01/17/2022. This is NOT a hearing date, but a deadline by which you must file a written appearance if you object to this proceeding.**

WITNESS,  
Hon. Richard A Simons,  
First Justice of this Court.  
Date: December 20, 2021

Anthony P Patella  
Register of Probate

AD#62915  
01/11/2022

## Commonwealth of Massachusetts The Trial Court Probate and Family Court

### INFORMAL PROBATE PUBLICATION NOTICE Docket No. BE21P0993EA

## Public Notices

Estate of:  
**Michael D Arpante**  
Also Known As:  
**Michael David Arpante**  
Date of Death: **October 10, 2021**

Berkshire Division

To all persons interested in the above captioned estate, by Petition of Petitioner

**Terryl A Arpante of Pittsfield MA**

a Will has been admitted to informal probate.

**Terryl A Arpante of Pittsfield** has been informally appointed as the Personal Representative of the estate to serve without surety on the bond.

The estate is being administered under informal procedure by the Personal Representative under the Massachusetts Uniform Probate Code without supervision by the Court. Inventory and accounts are not required to be filed with the Court, but interested parties are entitled to notice regarding the administration from the Personal Representative and can petition the Court in any matter relating to the estate, including distribution of assets and expenses of administration. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedure. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

Hashim & Spinola  
82 Wendell Avenue  
Pittsfield, MA 01201

AD# 62921  
01/11/2022

## Commonwealth of Massachusetts The Trial Court Probate and Family Court

### INFORMAL PROBATE PUBLICATION NOTICE Docket No. BE21P0987EA

Estate of:  
**Stephen Q. Thompson**  
Also Known As:  
**Stephen Q. Thompson**  
Date of Death: **06-14-2021**

Berkshire Division

To all persons interested in the above captioned estate, by Petition of Petitioner

**Kelly S Campbell of West Babylon NY**  
**Nicole L Hosier of Pittsfield MA**

a Will has been admitted to informal probate.

**Kelly S Campbell of West Babylon NY**  
**Nicole L Hosier of Pittsfield MA** has been informally appointed as the Personal Representative of the estate to serve without surety on the bond.

The estate is being administered under informal procedure by the Personal Representative under the Massachusetts Uniform Probate Code without supervision by the Court. Inventory and accounts are not required to be filed with the Court, but interested parties are entitled to notice regarding the administration from the Personal Representative and can petition the Court in any matter relating to the estate, including distribution of assets and expenses of administration. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedure. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

William D. Barry, Esq.  
Barry Law Offices  
150 North St.  
Suite 42  
Pittsfield, MA 01201

AD# 26900  
01/11/2022

## Commonwealth of Massachusetts The Trial Court Probate and Family Court

### CITATION ON PETITION FOR FORMAL ADJUDICATION Docket No. BE21P0994EA

Estate of:  
**Sherry L Wein**  
Also known as:  
**Sherry Wein**  
Date of Death: **12/03/2021**

Berkshire Probate and  
Family Court  
44 Bank Row  
Pittsfield, MA 01201  
(413) 442-6941

To all interested persons:  
A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by **Robert Wray of North Adams, MA** requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:  
**Robert Wray of North Adams, MA** be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **unsupervised administration**

### IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You

## Public Notices

have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 02/02/2022. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

### UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS  
Hon. Richard A Simons  
First Justice of this Court.  
Date: January 05, 2022

Anthony P. Patella  
Register of Probate

Pamela R. Green, Esq.  
Smith Green & Holmes, LLP  
75 North Street, Suite 400  
Pittsfield, MA 01201

AD# 62879  
01/11/2022

## Commonwealth of Massachusetts The Trial Court Probate and Family Court

### CITATION ON PETITION FOR FORMAL ADJUDICATION Docket No. BE22P0005EA

Estate of:  
**John C Reynolds**  
Also known as:  
**John Charles Reynolds**  
Date of Death: **12/09/2021**

Berkshire Probate and  
Family Court  
44 Bank Row  
Pittsfield, MA 01201  
(413) 442-6941

To all interested persons:  
A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by **Valeri J Reynolds of Richmond MA** requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:  
**Valeri J Reynolds of Richmond MA** be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **unsupervised administration**

### IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 02/03/2022. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

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WITNESS  
Hon. Richard A Simons  
First Justice of this Court.  
Date: January 05, 2022

Anthony P. Patella  
Register of Probate

Benjamin Smith, Esq.  
Benjamin Smith and Associates,  
Legal Counsel PC  
75 North St  
Suite 320  
Pittsfield, MA 01201

AD# 62901  
01/11/2022

### MORTGAGEE'S SALE OF REAL ESTATE

By virtue of and in execution of the Power of Sale contained in a certain mortgage given by YVETTE M. PINSONNEAULT f/k/a YVETTE M. MILLER and DARRELL E.

## Public Notices

PINSONNEAULT to GREYLOCK FEDERAL CREDIT UNION, dated December 19, 2006, and recorded on December 26, 2006, with the Berkshire Northern District Registry of Deeds in Book 1275, Page 889, of which mortgage the undersigned is the present holder, for breach of the conditions of the said mortgage and for the purpose of foreclosing, the same will be sold at public auction at 10:00 a.m. on the Twentieth (20th) day of January, 2022, at the mortgaged premises described below, to wit, 2-4 Murray Street, Adams, Massachusetts, all and singular, the premises in said Adams, Berkshire County, Massachusetts, described in said Mortgage, to wit:

Beginning at a point on the westerly line of North Summer Street and the southerly line of Murray Street; thence westerly 88.25 feet to the easterly line of land of one Reaves; thence southerly 66 feet parallel with the easterly line of said Reaves land to the northerly line of one Siara's land; thence easterly approximately 88 feet parallel with the northerly line of said land of Siara to the westerly line of said North Summer Street; thence northerly 66 feet parallel with said westerly line of North Summer Street to the point of beginning.

MEANING and INTENDING to convey and hereby expressly conveying, in mortgage, all and the same premises conveyed to Yvette M. Miller by deed of Jason E. Crews and Carolyn J. Crews dated August 21, 2003 and recorded with the Northern Berkshire Registry of Deeds in Book 1121, Page 775.

The mortgagor expressly reserve the rights of Homestead as declared by Yvette M. Miller dated August 21, 2003 and recorded in said Registry in Book 1121, Page 775, except with respect to the mortgagee herein, its successors and assigns; the mortgagors are not terminating said Homestead by granting the within conveyance.

Darrell E. Pinsonneault joins in this mortgage for the purpose of subordinating the estate of Homestead declared by Yvette M. Miller by instrument dated August 21, 2003 and recorded in said Registry in Book 1121, Page 775.

Said premises will be sold subject to any and all unpaid taxes and other municipal assessments and liens, prior liens, mortgages and other enforceable encumbrances of record having priority over the mortgage described herein, and subject to, and with the benefit of, all easements, restrictions, improvements, reservations and conditions of record, and all tenancies and/or rights of parties in possession, including rights or claims to personal property installed by tenants or former tenants now located on the premises. It shall be the bidder's sole responsibility to ascertain all items described in this paragraph and no representations are made concerning compliance with applicable zoning, building, sanitary or other state and/or municipal laws, ordinances or regulations.

TERMS OF SALE: FIVE THOUSAND DOLLARS (\$5,000.00) will be required to be paid in cash or by certified check or bank cashier's check by the purchaser at the time and place of sale. The balance is to be paid in cash or by certified or bank cashier's check and the deed shall be delivered within twenty-one (21) days after the public auction at the offices of HASHIM & SPINOLA, 82 Wendell Avenue, Pittsfield, Massachusetts. The purchaser will be responsible for all the closing costs, recording fees, deed stamps and shall be required to sign an Auctioneer's Memorandum containing the terms of this sale.

In the event the successful bidder shall default in purchasing the within described premises according to the terms of this Notice of Sale and/or the terms of the Memorandum of Sale executed at the time of the foreclosure, the Mortgagee reserves the right to sell the property by Foreclosure Deed to the second highest bidder provided that the second highest bidder shall deposit with the Mortgagee's attorneys, HASHIM & SPINOLA, the amount of the required deposit as set forth herein within three (3) business days after written Notice of Default of the previous highest bidder, and title shall be conveyed to the said second highest bidder within twenty (20) days of said written notice.

This sale may be postponed or adjourned from time to time, if necessary, by the attorney for the mortgagee at the scheduled time and place of sale. The description for the premises contained in said Mortgage shall control in the event of a typographical error in this publication.

Other terms, if any, to be announced at the time and place of sale.

GREYLOCK FEDERAL CREDIT UNION,  
Holder of Said Mortgage  
Date: December 21, 2021

FROM THE OFFICES OF:  
HASHIM & SPINOLA  
Attorneys for the Mortgagee  
82 Wendell Avenue  
Pittsfield, MA 01201  
(413) 499-1304

AUCTIONEER:  
MARCELLA ASSOCIATES  
LICENSE NO. 1687  
44 Lake Street

## Public Notices

Dalton, MA 01226

AD# 62617  
12/28/2021, 01/04/2022  
01/11/2022

### NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Tuesday, 1/25/22 at 6:00 PM to be held virtually.** The proposed J-B.A.M. Marijuana Processing Establishment is anticipated to be located at 71 Downing Industrial Parkway, Pittsfield, MA supplemental to the Marijuana Cultivation Establishment J-B.A.M. is currently operating at that location. There will be an opportunity for the public to ask questions.

Google Meet Video call link:  
<https://meet.google.com/dxx-gkdj-nws>  
Or dial: (US) +1 520-812-6927  
PIN: 721 599 385 #  
More phone numbers:  
<https://tel.meet/dxx-gkdj-nws?pin=5774281919275>

AD# 62864  
01/11/2022

### STATE OF CONNECTICUT INSURANCE DEPARTMENT

#### NOTICE OF PUBLIC HEARING CONCERNING THE PROPOSED ACQUISITION OF CONTROL OF PATRONS MUTUAL INSURANCE COMPANY CONTROLLED THROUGH AFFILIATION BY STATE AUTOMOBILE MUTUAL INSURANCE COMPANY BY LIBERTY MUTUAL HOLDING COMPANY, INC., LMHC MASSACHUSETTS HOLDINGS INC., AND LIBERTY MUTUAL GROUP INC.

Notice is hereby given that the Insurance Commissioner of the State of Connecticut will conduct a public hearing on January 27, 2022, at 9:00 a.m. in room 601 at the Connecticut Insurance Department, 6th Floor, 153 Market Street, Hartford, CT. The hearing will be conducted pursuant to sections 38a-129 through 38a-140, 4-166 through 4-184, as applicable, of the Connecticut General Statutes; and sections 38a-8-1 through 38a-8-104, and 38a-138-1 through 38a-138-16, as applicable, of the Regulations of the Connecticut State Agencies. This hearing shall be held in a hybrid fashion with a limited number of individuals being physically present and the remainder appearing remotely via telephone and video conference, in the event of a building closure, the hearing shall be held in an entirely virtual manner. Members of the public can attend this hearing via telephone by dialing 860-840-2075 and using passcode 502 203 498#. The hearing will include a period devoted exclusively to public comment. Persons interested in being designated a party or intervenor should consult sections 38a-8-48 and 38a-8-49 of the Regulations of the Connecticut State Agencies.

The public hearing is being held on the question of granting approval pursuant to section 38a-132(b)(1) of the Connecticut General Statutes of the application filed by Liberty Mutual Holding Company Inc., LMHC Massachusetts Holdings Inc., and Liberty Mutual Group Inc. ("Applicants"), dated August 6, 2021, and as amended and restated on December 9, 2021 (the "Application"). The Application requests the Insurance Commissioner's approval, as required by section 38a-130 of the Connecticut General Statutes, of the proposed acquisition of control of Patrons Mutual Insurance Company (the "Domestic Insurer") controlled through affiliation by State Automobile Mutual Insurance Company ("State Auto"). The Proposed Acquisition will be affected pursuant to the terms of the Agreement and Plan of Merger and Combination (the "Merger Agreement") between by and among the State Auto and the Applicants, dated as of July 12, 2021, and pursuant to the existing affiliation arrangement between the Domestic Insurer and State Auto. The official record of this proceeding, which includes a copy of the Application and the Agreement, is on file with the Connecticut Insurance Department at 153 Market Street, 7th floor, Hartford, Connecticut and is available for public inspection during regular business hours, it is also available on the Connecticut Insurance Department's website at <https://portal.ct.gov/cid>. At the public hearing, representatives of the Applicants, the Domestic Insurer, and State Auto as well as any other party or intervenor designated by the Insurance Commissioner pursuant to sections 38a-8-48 and 38a-8-49 of the Regulations of the Connecticut State Agencies, and his appointed hearing officer, will appear and be heard concerning the consideration by the Insurance Commissioner of the Application. The public will, at the hearing officer's discretion and in accordance with section 4-177(c)(b) of the Connecticut General Statutes, be given an opportunity to comment on the Application with respect to the issues to be considered by the Insurance Commissioner. Written statements may also be submitted during the public comment portion of the public hearing or filed with the Insurance Department prior to the close of business on January 26, 2022, by mailing or delivering such statements to the Connecticut Insurance Department, P.O. Box 816, Hartford, CT 06142-0816,

## Public Notices

Attention: Jennifer M. Dowty, Esq.  
The Insurance Department does not discriminate on the basis of disability in admission to, access to, or operation of its programs, services or activities, in accordance with Title II of the Americans with Disabilities Act of 1990. Individuals requiring auxiliary aids for communication or other accommodation are invited to make their needs and preferences known by calling Victoria Cruise at (860) 757-5349.  
Dated at Hartford, Connecticut, this 29th day of December 2021.

Andrew N. Mais  
Insurance Commissioner

AD# 62854  
01/11/2022, 01/18/2022

### TOWN OF LEE CONSERVATION COMMISSION NOTICE OF PUBLIC HEARING

In accordance with General Laws Chapter 131, Section 40, notice is hereby given that a public hearing of the Lee Conservation Commission will be held via Zoom on **Wednesday, January 19, 2022 at 7:00 PM** on the Request for Determination filed by Eurovia Atlantic Coast D/B/A Northeast Paving for relocation of the existing asphalt roadway out of the inner-Riverfront Area and restoration of the area to native vegetation at 1 Willow Hill Road. The public is welcomed and encouraged to attend.

Kathy Arment, Chair  
Lee Conservation Commission

AD# 62899  
01/11/2022

### TOWN OF NEW MARLBOROUGH CONSERVATION COMMISSION PUBLIC HEARING

The Conservation Commission of the Town of New Marlborough will hold a public hearing on **January 20, 2022 at 5 PM via zoom/conference call** under the provisions of the Wetlands Protection Act, Chapter 131, and Section 40 to consider a Request for Determination of Applicability:

Elizabeth Goodman  
1074 Clayton Mill River Road  
Mill River, MA 01244

For the property located at:  
902 Clayton Mill River Rd  
New Marlborough, MA 01230

Assessors Map 409, Lot 32  
Proposed new driveway and related site work.

Freddy Friedman, Co-Chair  
Conservation Commission

AD# 62896  
01/11/2022

### TOWN OF NEW MARLBOROUGH CONSERVATION COMMISSION PUBLIC HEARING

The Conservation Commission of the Town of New Marlborough will hold a public hearing on **January 20, 2022 at 5 PM via zoom/conference call** under the provisions of the Wetlands Protection Act, Chapter 131, and Section 40 to consider a Request of Determination:

David Madow &  
Patricia L. Salzmann-Madow  
PO Box 702  
Great Barrington, MA 01230

For the property located at:  
0 Hartsville New Marlborough Rd  
New Marlborough, MA 01230

Assessors Map 404, Lot 45.1  
Improvements to existing driveway, construction of single family home, septic, well and related site work.

Freddy Friedman, Co-Chair  
Conservation Commission

AD# 62897  
01/11/2022

### Town of Otis Conservation Commission

#### Notice of Public Hearing

Pursuant to M.G.L. Chapter 131, Section 40, the Wetlands Protection Act, the Otis Conservation Commission will hold public hearings on **Tuesday, January 18, 2022, at 6:00 p.m., Remotely via the Zoom Application**, to review the following applications:

• **Public Hearing NOI** Submitted by SK Design on behalf of Mark Amanti w/MBA Realty LLC, 1401 Reservoir Road, map 16 lot 45, regarding the construction & maintenance of a private marina within the associated resource areas of Otis Reservoir.

• **Public Hearing RDA** Submitted by Larkum Lake Realty Co., LLC, 620-622 Reservoir Road, map 15 lot 60, regarding the installation of a 10' x 18' shed within the BZ of BVW.

• **Public Hearing NOI** Submitted by Kelly, Granger, Parsons & Assocs., Inc. on behalf of Arthur & Joan Tenser, 1 Derr Run, map 10E lot 28, regarding the replacement of existing septic with a new tank & pump within the BZ of Benton Brook.

• **Public Hearing RDA** Submitted by Berkshire Eng., Inc. on behalf of Todd Brouillette, 280 Kibbe Road, map 17C lot 65, regarding the upgrade of septic system within the BZ of Otis Reservoir.

• **Public Hearing RDA** Submitted by Berkshire Eng., Inc. on behalf of





James McMahon <james@mcmahonstrategic.com>

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## electronic tearsheet

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**Joyner, Nathaniel** <njoyner@cityofpittsfield.org>

Fri, Jan 14, 2022 at 2:27 PM

To: James McMahon <james@mcmahonstrategic.com>

Cc: Monique Palazzi <monique@j-bam.net>, Brian Palazzi <brian@j-bam.net>, Anthony Palazzi <anthony@j-bam.net>

Hi James,

Thanks for keeping me updated, I have received the notice and it will be posted outside of the City Clerks office in the public bulletin.

Thank you,

**From:** James McMahon <james@mcmahonstrategic.com>

**Sent:** Friday, January 14, 2022 11:04 AM

**To:** Joyner, Nathaniel <njoyner@cityofpittsfield.org>

**Cc:** Monique Palazzi <monique@j-bam.net>; Brian Palazzi <brian@j-bam.net>; Anthony Palazzi <anthony@j-bam.net>

**Subject:** Re: electronic tearsheet

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

[Quoted text hidden]

[Quoted text hidden]

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[Quoted text hidden]

**Robbie Brassard**

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**Public Notice Coordinator**

o. 413-496-6238

[75 South Church Street](#)

Pittsfield, MA 01201

Nathaniel Joyner  
Permitting Coordinator

Community Development

[City of Pittsfield](#)

70 Allen Street

Pittsfield, MA 01201

(413) 448-9673

[njoyner@cityofpittsfield.org](mailto:njoyner@cityofpittsfield.org)

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

1/14/22

### J-B.A.M., Inc Community Outreach Meeting Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Tuesday, 1/25/22 at 6:00 PM to be held virtually.

The proposed J-B.A.M. Marijuana Processing Establishment is anticipated to be located at 71 Downing Industrial Parkway, Pittsfield, MA supplemental to the Marijuana Cultivation Establishment J-B.A.M. is currently operating at that location.

Information will be presented at the community outreach meeting including:

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

There will be an opportunity for the public to ask questions.

Questions can be submitted in advance or asked during the meeting and after the presentation. If you have a question you would like to submit in advance, please email [james@mcmahonstrategic.com](mailto:james@mcmahonstrategic.com) with the subject line "Pittsfield Outreach Meeting Question Submission" no later than 5:00pm on Tuesday, January 25th, 2020.

A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by email request. If you are unable to attend this event, but would like to be included on our mailing list that will provide updates about the facility, please send an email to [james@mcmahonstrategic.com](mailto:james@mcmahonstrategic.com)

Google Meet Video call link: <https://meet.google.com/dxx-gkdj-nws>

Or dial: (US) +1 520-812-6927 PIN: 721 599 385#

More phone numbers: <https://tel.meet/dxx-gkdj-nws?pin=5774281919275>

1/14/22

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J-B.A.M. is a currently licensed and operational cannabis cultivation licensee located at 71 Downing Parkway Building A in Pittsfield, MA. This site is industrially zoned (I-L Zoning) and allows cannabis cultivation and manufacturing by right, with site plan approval required, per Section 7.735 of the Pittsfield Zoning Code.

J-B.A.M. had a site plan approved for cultivation purposes, and on 12/21/21, obtained an approval for Site Plan Review Modification for addition of the Manufacturing use.

The site is currently zoned and operational and there is no plan to move the business or conduct operations in any other location.

There was one attendee to the meeting -the adjacent property abutter, Berkshire Transit Management.

The file is too large to upload – it has been emailed to [Licensing@cccmass.com](mailto:Licensing@cccmass.com)

## **Plan for Positive Impact 2.1**

In order to positively impact the disproportionately affected areas of Massachusetts, the Company plans to create an educational initiative and a job training program. We are located in the City of Pittsfield one of the Commission's defined twenty-nine areas of disproportionate impact. Our efforts to positively impact the disproportionately affected areas of Massachusetts will focus on bolstering our local community of Pittsfield Massachusetts.

### **Goals**

J-B.A.M. intends to devote its resources to create and develop beneficial programs centered on issues which it holds dear to its heart. These programs include educational seminars and job training sessions. As our facility is located in Pittsfield, an area of disproportionate impact, we believe our own hiring practices will focus on hiring a workforce from the disproportionately impacted area of Pittsfield.

In addition, the company will provide educational seminars and job training to the citizens of Pittsfield who are non-employees of the company.

### **MEASUREMENT OF GOALS**

Residents of the disproportionately affected area of Pittsfield will be targeted through publication, monthly until at least **20** spots are filled, of the job training program in local newspapers, such as the Berkshire Eagle, and community bulletins. At minimum, **2** Job Training event notices will be posted each week, for two weeks prior to the event in the local publication: The Berkshire Eagle.

### **Programs**

J-B.A.M. recognizes that the growth of the marijuana program in Massachusetts will raise a number of questions and concerns within the community at-large. To address these concerns, the Company will offer public education seminars, to up to 30 individuals, in order to provide an opportunity for local community members to learn more about cannabis. These free seminars will be open to the public, take place on a Saturday or Sunday and last for roughly an hour.

The educational seminars will take place on a six-month rolling basis and be located off of the Company's premises or via electronic means. Seminars will include lectures by the Company's executive staff and employees that will inform the community on the facts surrounding the company's activities, cannabis use, and the industry at large, and will address misconceptions or fears that many may have concerning the Company's community presence.

Proposed topics for the bi-annual seminars include:

- Engagement with the CCC,
- cannabis application drafting,
- best practices for cannabis sanitation and compliance,
- information on cannabis wellness,
- small business coaching,

- and resume and interview coaching

The dates and times of the seminars will be posted in the Berkshire Eagle the week prior to the event. The executive management team of the company will develop its education and training seminars in order to ensure a comprehensive education useful to the public who are concerned about the industry's impact on the community or interested in taking part and being involved in the industry.

Our job training programs will take place in the city of Pittsfield, an area of disproportionate impact. Not only will we encourage candidates in our job training program to fill positions at our own facility, we aim to help candidates find open gainful employment in the cannabis industry. The aim of the programs is to prepare non-employees of the company for gainful employment in the marijuana industry. We will further their chances of job placement by providing letters of recommendation and references attesting to their learned skills. Every individual that attends and completes the job trainings will fill out a contact form and waiver that will allow the company to follow up on the careers of these individuals and assess the impact of our training program.

J-B.A.M. intends to hold job training sessions to meet the demands of the industry and the job market. The training sessions will be an intensive two-day weekend course from 10-5 on a consecutive Saturday and Sunday with lunch provided. The company will begin this process immediately on licensure. Documentation of each event, along with the proposed syllabus and any relevant materials shall be made available to the commission. At minimum, 2 Job Training event notices will be posted each week, for two weeks prior to the event in the local publication: The Berkshire Eagle.

Specific populations of disproportionately affected area of Pittsfield will be targeted through publication, monthly until at least 20 spots are filled, of the job training program in local newspapers, such as the Pittsfield Recorder, and community bulletins.

In order to positively impact the disproportionately affected we will give selection preferences to those who fall into the following enumerated categories; Past or present residents of Pittsfield a geographic "areas of disproportionate impact," which has been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact; Individuals, or individuals with spouses or parents, with past drug convictions, or; Our Job training program shall provide opportunities to those who are interested in a career in the cannabis industry. While these programs are not meant to replace the mandated Responsible Vendor Training program, the lectures should allow candidates to better grasp the nuances of the industry and familiarize themselves with what is expected of them and the industry-standard protocols for achieving those goals.

## **Measurements**

The Company intends to begin its community impact initiative beginning on the date of licensure and hopes to achieve the following one-year targets near the time for the renewal of the license:

1. J-B.A.M. hopes to hold at two educational seminars and two job training sessions within the first year

of operation. The educational seminars will be open to at least 30 people. The job training sessions will graduate at least 20 trainees.

2. The company intends most, 50%, of its own workforce to fall into one of the enumerated categories above, as the facility is located within an area of disproportionate impact.

3. Similarly, the majority of applicants for the job training program will be comprised of the enumerated categories. The job training program will be advertised locally in the area of disproportionate impact, through the use of newspapers and bulletin boards. The trainee class will be comprised of a majority of individuals from the aforementioned enumerated categories.

Though, in order to quantitatively show progress in furthering the goal of positively impacting the disproportionately affect areas of Massachusetts the company shall grade its own efforts and provide documentation to the commission with the following information.

- Number of individuals hired and retained as employees at J-B.A.M.
- Number of individuals trained from the enumerated categories and overall.
- Number of individuals that attended the training that achieved gainful employment in the cannabis industry within 1 year from completing training from the enumerated categories and overall.
- Number and subject matter of job trainings offered and performed by our program.

J-B.A.M. has a plan to positively impact the disproportionately affected areas of Massachusetts by responding to the needs of the Pittsfield community. Our efforts in job growth and industry specific-training as well as seminars which educate concerned and/or interested citizens about the practices of such a company in their community are the ways that J-B.A.M. will serve the Pittsfield Community.

The Company will adhere to the requirements set forth in 935 CMR 500.105(4), providing that the Company shall not engage in any prohibited advertising, branding, marketing, or sponsorship practices. The Company will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

**D**

# The Commonwealth of Massachusetts

William Francis Galvin  
Secretary of the Commonwealth  
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

## Articles of Organization (General Laws Chapter 156D, Section 2.02; 950 CMR 113.16)

FORM MUST BE TYPED

### ARTICLE I

The exact name of the corporation is:

J - B.A.M., Inc.

### ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

### ARTICLE III

State the total number of shares and par value, \* if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
Common	275,000			

\*G.L. Chapter 156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. Chapter 156D, Section 6.21, and the comments relative thereto.

**ARTICLE IV**

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

Not applicable

**ARTICLE V**

The restrictions, if any, imposed by the articles of organization upon the transfer of shares of any class or series of stock are:

None

**ARTICLE VI**

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

See Continuation Sheet VI attached hereto and made a part hereof.

*Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.*



Articles of Organization of J - B.A.M., Inc.  
Continuation Sheet VI

1. Minimum Number of Directors. The board of directors may consist of one or more individuals, notwithstanding the number of shareholders.
2. Personal Liability of Directors to Corporation. No director shall have personal liability to the corporation for monetary damages for breach of fiduciary duty as a director notwithstanding any provision of law imposing such liability; provided however, that, to the extent required by applicable law, this provision shall not eliminate or limit the liability of a director (a) for any breach of the director's duty of loyalty to the corporation or its shareholders, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (c) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts or successor provisions thereto, or (d) for any transaction from which the director derived an improper personal benefit. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any director for or with respect to any act or omission of such director occurring prior to such repeal or amendment.
3. Authorization of Directors to Make, Amend or Repeal By-Laws. The board of directors may make, amend or repeal the by-laws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D of the General Laws of Massachusetts, the Articles of Organization or the by-laws requires action by the shareholders.

**ARTICLE VII**

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

**ARTICLE VIII**

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:  
**66 West Street, Suite 300, Pittsfield, MA 01201**
- b. The name of its initial registered agent at its registered office: **Cain, Hibbard & Myers, PC**
- c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: **Brian E. Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Treasurer: **Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Secretary: **Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029**

Director(s): **Brian E. Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029  
Monique Palazzi, 724 Tolland Road, Otis, MA 01029; mailing address P. O. Box 311, East Otis, MA 01029  
Anthony Palazzi, 73 Dickinson Drive, Granville MA 01034**

- d. The fiscal year end of the corporation: **December**
- e. A brief description of the type of business in which the corporation intends to engage: **The corporation is being formed for the purpose of applying to the Massachusetts Cannabis Control Commission for a license for marijuana cultivation.**
- f. The street address of the principal office of the corporation: **c/o Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201**
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

**c/o Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201**, which is  
*(number, street, city or town, state, zip code)*

- its principal office;
- an office of its transfer agent;
- an office of its secretary/assistant secretary;
- its registered office.

Signed this 13<sup>th</sup> day of May, 2019 by the incorporator(s):

Signature: *F. Sydney Smithers*

Name: F. Sydney Smithers, Esq.

Address: Cain, Hibbard & Myers, PC, 66 West Street, Suite 300, Pittsfield, MA 01201

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

May 14, 2019 03:36 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

No Fee

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

**Statement of Change of Supplemental Information**

(General Laws, Chapter 156D, Section 2.02 AND Section 8.45; 950 CMR 113.17)

**1. Exact name of the corporation:** J - B.A.M., INC.

**2. Current registered office address:**

Name: CAIN, HIBBARD & MYERS, PC  
 No. and Street: 66 WEST ST., STE. 300  
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

**3. The following supplemental information has changed:**

*Names and street addresses of the directors, president, treasurer, secretary*

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	BRIAN E. PALAZZI	724 TOLLAND RD. OTIS, MA 01029 USA
TREASURER	MONIQUE PALAZZI	724 TOLLAND RD. OTIS, MA 01029 USA
SECRETARY	MONIQUE PALAZZI	724 TOLLAND RD. OTIS, MA 01029 USA
VICE PRESIDENT	MONIQUE PALAZZI	724 TOLLAND ROAD EAST OTIS, MA 01029 USA
VICE PRESIDENT	ANTHONY PALAZZI	5 FOX HOLLOW LENOX, MA 01240 USA
DIRECTOR	ANTHONY PALAZZI	5 FOX HOLLOW LENOX, MA 01240 USA
DIRECTOR	BRIAN E. PALAZZI	724 TOLLAND RD. OTIS, MA 01029 USA
DIRECTOR	MONIQUE PALAZZI	724 TOLLAND RD. OTIS, MA 01029 USA

     **Fiscal year end:**  
 December

**Type of business in which the corporation intends to engage:**

CANNABIS CULTIVATION

     **Principal office address:**

No. and Street: 66 WEST STREET  
724 TOLLAND RD  
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

\_\_\_ g. Street address where the records of the corporation required to be kept in the Commonwealth are located (*post office boxes are not acceptable*):

No. and Street: 71 DOWNING INDUSTRIAL PARK  
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

which is

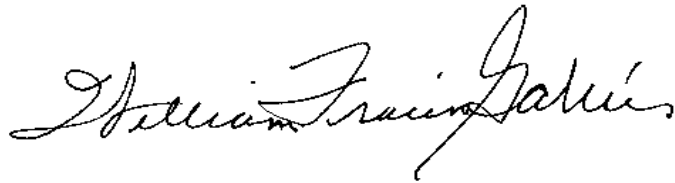
its principal office  an office of its transfer agent  
 an office of its secretary/assistant secretary  its registered office

Signed by MONIQUE PALAZZI, its OTHER OFFICER  
on this **29** Day of **October**, **2021**

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

October 29, 2021 05:07 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

BY-LAWS  
OF  
J – B.A.M., INC.

1. MEETINGS OF SHAREHOLDERS.

1.1 Annual Meeting. The Corporation shall hold an annual meeting of shareholders on the third Monday in February of each year or at such other time within six months after the end of the Corporation's fiscal year as shall be fixed by the Directors. The purposes for which the annual meeting is to be held, in addition to those prescribed by the Articles of Organization, shall be for electing directors and for such other purposes as shall be specified in the notice for the meeting, and only business within such purposes may be conducted at the meeting. In the event an annual meeting is not held at the time fixed in accordance with these By-Laws or the annual meeting is not held within 13 months after the last annual meeting was held, the Corporation may designate a special meeting held thereafter as a special meeting in lieu of the annual meeting, and the meeting shall have all of the effect of an annual meeting.

1.2 Special Meetings. Special meetings of the shareholders may be called by the President or by the Directors, and shall be called by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by another officer, if the holders of at least 10%, or such lesser percentage as the Articles of Organization permit, of all the votes entitled to be cast on any issue to be considered at the proposed special meeting sign, date, and deliver to the Secretary one or more written demands for the meeting describing the purpose for which it is to be held. Only business within the purpose or purposes described in the meeting notice may be conducted at a special shareholders' meeting.

1.3 Place of Meetings. All meetings of shareholders shall be held at the principal office of the Corporation unless a different place is specified in the notice of the meeting or the meeting is held solely by means of remote communication in accordance with Section 1.11.

1.4 Requirement of Notice. A written notice of the date, time and place of each annual and special shareholders' meeting describing the purposes of the meeting shall be given to shareholders entitled to vote at the meeting (and, to the extent required by law or the Articles of Organization, to shareholders not entitled to vote at the meeting) no fewer than seven nor more than 60 days before the meeting date. If an annual or special meeting of shareholders is adjourned to a different date, time or place, notice need not be given of the new date, time or place if the new date, time or place, if any, is announced at the meeting before adjournment. If a new record date for the adjourned meeting is fixed, however, notice of the adjourned meeting shall be given under this Section 1.4 to persons who are shareholders as of the new record date. All notices to shareholders shall conform to the requirements of Section 3.

1.5 Waiver of Notice. A shareholder may waive any notice required by law, the Articles of Organization, or these By-Laws before or after the date and time stated in the notice. The waiver shall be in writing, be signed by the shareholder entitled to the notice, and be

delivered to the Corporation for inclusion with the records of the meeting. A shareholder's attendance at a meeting (a) waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting, and (b) waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

## 1.6 Quorum.

1.6.1 Unless otherwise provided by law, or in the Articles of Organization, these By-Laws or a resolution of the Directors requiring satisfaction of a greater quorum requirement for any voting group, a majority of the votes entitled to be cast on the matter by a voting group constitutes a quorum of that voting group for action on that matter. As used in these By-Laws, a voting group includes all shares of one or more classes or series that, under the Articles of Organization or the Massachusetts Business Corporation Act, Massachusetts General Laws Chapter 156D, as in effect from time to time (the "MBCA"), are entitled to vote and to be counted together collectively on a matter at a meeting of shareholders.

1.6.2 A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment of that meeting unless (a) the shareholder attends solely to object to lack of notice, defective notice or the conduct of the meeting on other grounds and does not vote the shares or otherwise consent that they are to be deemed present, or (b), in the case of an adjournment, a new record date is or shall be set for that adjourned meeting.

1.7 Voting and Proxies. Unless the Articles of Organization provide otherwise, each outstanding share, regardless of class, is entitled to one vote on each matter voted on at a shareholders' meeting. A shareholder may vote his or her shares in person or may appoint a proxy to vote or otherwise act for him or her by signing an appointment form, either personally or by his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized to tabulate votes. Unless otherwise provided in the appointment form, an appointment is valid for a period of 11 months from the date the shareholder signed the form or, if it is undated, from the date of its receipt by the officer or agent. An appointment of a proxy is revocable by the shareholder unless the appointment form conspicuously states that it is irrevocable and the appointment is coupled with an interest, as defined in the MBCA. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment. A transferee for value of shares subject to an irrevocable appointment may revoke the appointment if he or she did not know of its existence when he or she acquired the shares and the existence of the irrevocable appointment was not noted conspicuously on the certificate representing the shares or on the information statement for shares without certificates. Subject to the provisions of Section 7.24 of the MBCA and to any express limitation on the proxy's authority appearing on the face of the appointment form, the Corporation is entitled to accept the proxy's vote or other action as that of the shareholder making the appointment.



1.8 Action at Meeting. If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, is taken by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater number of affirmative votes is required by law, or the Articles of Organization, these By-Laws or a resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups. Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

1.9 Action Without Meeting by Written Consent.

1.9.1 Action required or permitted to be taken at a shareholders' meeting may be taken without a meeting if the action is taken either: (a) by all shareholders entitled to vote on the action; or (b), to the extent permitted by the Articles of Organization, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the Corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the Corporation as required by this Section 1.9.1. A consent signed under this Section 1.9.1 has the effect of a vote at a meeting.

1.9.2 If action is to be taken pursuant to the consent of voting shareholders without a meeting, the Corporation, at least seven days before the action pursuant to the consent is taken, shall give notice, which complies in form with the requirements of Section 3, of the action (a) to nonvoting shareholders in any case where such notice would be required by law if the action were to be taken pursuant to a vote by voting shareholders at a meeting, and (b), if the action is to be taken pursuant to the consent of less than all the shareholders entitled to vote on the matter, to all shareholders entitled to vote who did not consent to the action. The notice shall contain, or be accompanied by, the same material that would have been required by law to be sent to shareholders in or with the notice of a meeting at which the action would have been submitted to the shareholders for approval.

1.10 Record Date. The Directors may fix the record date in order to determine the shareholders entitled to notice of a shareholders' meeting, to demand a special meeting, to vote, or to take any other action. If a record date for a specific action is not fixed by the Board of Directors, and is not supplied by law, the record date shall be the close of business either on the day before the first notice is sent to shareholders, or, if no notice is sent, on the day before the meeting or, in the case of action without a meeting by written consent, the date the first shareholder signs the consent. A record date fixed under this Section 1.10 may not be more than 70 days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date, which it shall do if the meeting is adjourned to a date more than 120 days after the date fixed for the original meeting.

1.11 Meetings by Remote Communications. Unless otherwise provided in the Articles of Organization, if authorized by the Directors, any annual or special meeting of shareholders need not be held at any place but may instead be held solely by means of remote communication; and subject to such guidelines and procedures as the Board of Directors may adopt, shareholders and proxyholders not physically present at a meeting of shareholders may, by means of remote communications: (a) participate in a meeting of shareholders; and (b) be deemed present in person and vote at a meeting of shareholders whether such meeting is to be held at a designated place or solely by means of remote communication, provided that: (i) the Corporation shall implement reasonable measures to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder; (ii) the Corporation shall implement reasonable measures to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings; and (iii), if any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, a record of such vote or other action shall be maintained by the Corporation.

1.12 Form of Shareholder Action.

1.12.1 Any vote, consent, waiver, proxy appointment or other action by a shareholder or by the proxy or other agent of any shareholder shall be considered given in writing, dated and signed, if, in lieu of any other means permitted by law, it consists of an electronic transmission that sets forth or is delivered with information from which the Corporation can determine (a) that the electronic transmission was transmitted by the shareholder, proxy or agent or by a person authorized to act for the shareholder, proxy or agent; and (b) the date on which such shareholder, proxy, agent or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered to be the date on which it was signed. The electronic transmission shall be considered received by the Corporation if it has been sent to any address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

1.12.2 Any copy, facsimile or other reliable reproduction of a vote, consent, waiver, proxy appointment or other action by a shareholder or by the proxy or other agent of any shareholder may be substituted or used in lieu of the original writing for any purpose for which the original writing could be used, but the copy, facsimile or other reproduction shall be a complete reproduction of the entire original writing.

## 2. DIRECTORS.

2.1 Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, its Board of Directors.

2.2 Number and Election. The Board of Directors shall consist of one or more individuals, with the number fixed by the shareholders at the annual meeting or by the Board of Directors, but, unless otherwise provided in the Articles of Organization, if the Corporation has more than one shareholder, the number of Directors shall not be less than three, except that whenever there shall be only two shareholders, the number of Directors shall not be less than two. Except as otherwise provided in these By-Laws or the Articles of Organization, the Directors shall be elected by the shareholders at the annual meeting.

2.3 Vacancies. If a vacancy occurs on the Board of Directors, including a vacancy resulting from an increase in the number of Directors: (a) the shareholders may fill the vacancy; (b) the Board of Directors may fill the vacancy; or (c), if the Directors remaining in office constitute fewer than a quorum of the Board, they may fill the vacancy by the affirmative vote of a majority of all the Directors remaining in office. A vacancy that will occur at a specific later date may be filled before the vacancy occurs but the new Director may not take office until the vacancy occurs.

2.4 Change in Size of the Board of Directors. The number of Directors may be fixed or changed from time to time by the shareholders or the Board of Directors, and the Board of Directors may increase or decrease the number of Directors last approved by the shareholders.

2.5 Tenure. The terms of all Directors shall expire at the next annual shareholders' meeting following their election. A decrease in the number of Directors does not shorten an incumbent Director's term. The term of a Director elected to fill a vacancy shall expire at the next shareholders' meeting at which Directors are elected. Despite the expiration of a Director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of Directors.

2.6 Resignation. A Director may resign at any time by delivering written notice of resignation to the Board of Directors, its chairman, or to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date.

2.7 Removal. The shareholders may remove one or more Directors with or without cause. A Director may be removed for cause by the Directors by vote of a majority of the Directors then in office. A Director may be removed by the shareholders or the Directors only at a meeting called for the purpose of removing him or her, and the meeting notice must state that the purpose, or one of the purposes, of the meeting is removal of the Director.

2.8 Regular Meetings. Regular meetings of the Board of Directors may be held at such times and places as shall from time to time be fixed by the Board of Directors without notice of the date, time, place or purpose of the meeting. If a quorum of Directors is present, the annual meeting of the Board of Directors, for the appointment of officers and consideration of

other matters, shall be held without notice immediately after the annual meeting of shareholders and at the same place.

2.9 Special Meetings. Special meetings of the Board of Directors may be called by the President, by the Secretary, by any two Directors, or by one Director in the event that there is only one Director.

2.10 Notice. Special meetings of the Board must be preceded by at least two days' notice of the date, time and place of the meeting. The notice need not describe the purpose of the special meeting. All notices to directors shall conform to the requirements of Section 3.

2.11 Waiver of Notice. A Director may waive any notice before or after the date and time of the meeting. The waiver shall be in writing, signed by the Director entitled to the notice, or in the form of an electronic transmission by the Director to the Corporation, and filed with the minutes or corporate records. A Director's attendance at or participation in a meeting waives any required notice to him or her of the meeting unless the Director, at the beginning of the meeting or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

2.12 Quorum. A quorum of the Board of Directors consists of a majority of the Directors then in office, provided always that any number of Directors (whether one or more and whether or not constituting a quorum) constituting a majority of Directors present at any meeting or at any adjourned meeting may make any reasonable adjournment thereof.

2.13 Action at Meeting. If a quorum is present when a vote is taken, the affirmative vote of a majority of Directors present is the act of the Board of Directors. A Director who is present at a meeting of the Board of Directors or a committee of the Board of Directors when corporate action is taken is considered to have assented to the action taken unless: (a) he or she objects at the beginning of the meeting, or promptly upon his or her arrival, to holding it or transacting business at the meeting; (b) his or her dissent or abstention from the action taken is entered in the minutes of the meeting; or (c) he or she delivers written notice of his or her dissent or abstention to the presiding officer of the meeting before its adjournment or to the Corporation immediately after adjournment of the meeting. The right of dissent or abstention is not available to a Director who votes in favor of the action taken.

2.14 Action Without Meeting. Any action required or permitted to be taken by the Directors may be taken without a meeting if the action is taken by the unanimous consent of the members of the Board of Directors. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each Director, or delivered to the Corporation by electronic transmission to the address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of Directors, and included in the minutes or filed with the corporate records reflecting the action taken. Action taken under this Section 2.14 is effective when the last Director signs or delivers the consent, unless the consent specifies a different effective date. A consent signed or delivered under this Section 2.14 has the effect of a meeting vote and may be described as such in any document.

2.15 Telephone Conference Meetings. The Board of Directors may permit any or all Directors to participate in a regular or special meeting by, or conduct the meeting through the use of, any means of communication by which all Directors participating may simultaneously hear each other during the meeting. A Director participating in a meeting by this means is considered to be present in person at the meeting.

2.16 Committees. The Board of Directors may create one or more committees and appoint members of the Board of Directors to serve on them. Each committee may have one or more members, who serve at the pleasure of the Board of Directors. The creation of a committee and appointment of members to it must be approved by a majority of all the Directors in office when the action is taken. Section 3 and Sections 2.10 through 2.15 of these By-Laws shall apply to committees and their members. To the extent specified by the Board of Directors, each committee may exercise the authority of the Board of Directors. A committee may not, however: (a) authorize distributions; (b) approve or propose to shareholders action that the MBCA requires be approved by shareholders; (c) change the number of the Board of Directors, remove Directors from office or fill vacancies on the Board of Directors; (d) amend the Articles of Organization; (e) adopt, amend or repeal By-Laws; or (f) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the Board of Directors.

2.17. Compensation. The Board of Directors may fix the compensation of Directors.

2.18 Loans to Directors. The Corporation may not lend money to, or guarantee the obligation of, a Director unless: (a) the specific loan or guarantee is approved by a majority of the votes represented by the outstanding voting shares of all classes, voting as a single voting group, except the votes of shares owned by or voted under the control of the benefited Director; or (b) the Board of Directors determines that the loan or guarantee benefits the Corporation and either approves the specific loan or guarantee or a general plan authorizing loans and guarantees. The fact that a loan or guarantee is made in violation of this Section 2.18 shall not affect the borrower's liability on the loan.

### 3. MANNER OF NOTICE.

All notices hereunder shall conform to the following requirements:

3.1 Notice shall be in writing unless oral notice is reasonable under the circumstances. Notice by electronic transmission is written notice.

3.2 Notice may be communicated as follows: (a) in person; (b) by telephone, voice mail or other electronic means; (c) by mail; (d) by electronic transmission; or (e) by messenger or delivery service.

3.3 Written notice to a shareholder, other than notice by electronic transmission, if in a comprehensible form, is effective upon deposit in the United States mail, if mailed postpaid and correctly addressed to the shareholder's address shown in the Corporation's current record of shareholders.

3.4 Written notice by electronic transmission, if in comprehensible form, is effective: (a) if by facsimile telecommunication, when directed to a number furnished by the shareholder

for the purpose; (b) if by electronic mail, when directed to an electronic mail address furnished by the shareholder for the purpose; (c) if by a posting on an electronic network together with separate notice to the shareholder of such specific posting, directed to an electronic mail address furnished by the shareholder for the purpose, upon the later of (i) such posting and (ii) the giving of such separate notice; and (d) if by any other form of electronic transmission, when directed to the shareholder in such manner as the shareholder shall have specified to the Corporation. An affidavit of the Secretary or an Assistant Secretary of the Corporation, the transfer agent or other agent of the Corporation that the notice has been given by a form of electronic transmission shall, in the absence of fraud, be prima facie evidence of the facts stated therein.

3.5 Except as provided in Section 3.3, written notice, other than notice by electronic transmission, if in a comprehensible form, is effective at the earliest of the following: (a) when received; (b) five days after its deposit in the United States mail, if mailed postpaid and correctly addressed; (c) on the date shown on the return receipt, if sent by registered or certified mail, return receipt requested, or (d), if sent by messenger or delivery service, on the date shown on the return receipt signed by or on behalf of the addressee.

3.6 Oral notice is effective when communicated if communicated in a comprehensible manner.

#### 4. OFFICERS.

4.1 Enumeration. The Corporation shall have a President, a Treasurer, a Secretary and such other officers as may be appointed by the Board of Directors from time to time in accordance with these By-Laws. The Board may appoint one of its members to the office of Chairman of the Board and from time to time define the powers and duties of that office notwithstanding any other provisions of these By-Laws.

4.2 Appointment. The officers shall be appointed by the Board of Directors. A duly appointed officer may appoint one or more officers or assistant officers if authorized by the Board of Directors. Each officer has the authority and shall perform the duties set forth in these By-Laws or, to the extent consistent with these By-Laws, the duties prescribed by the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers.

4.3 Qualification. The same individual may simultaneously hold more than one office in the Corporation.

4.4 Tenure. Officers shall hold office until the first meeting of the Directors following the next annual meeting of shareholders after their appointment and until their respective successors are duly appointed, unless a shorter or longer term is specified in the vote appointing them.

4.5 Resignation. An officer may resign at any time by delivering notice of the resignation to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date. If a resignation is made effective at a later date and the Corporation accepts the future effective date, the Board of Directors may fill the pending

vacancy before the effective date if the Board of Directors provides that the successor shall not take office until the effective date.

4.6 Removal. The Board of Directors may remove any officer at any time with or without cause.

4.7 President. The President when present shall preside at all meetings of the shareholders and, if there is no Chairman of the Board of Directors, of the Directors. He or she shall be the chief executive officer of the Corporation except as the Board of Directors may otherwise provide. The President shall perform such duties and have such powers additional to the foregoing as the Directors shall designate.

4.8 Treasurer. The Treasurer shall, subject to the direction of the Directors, have general charge of the financial affairs of the Corporation and shall cause to be kept accurate books of accounts. He or she shall have custody of all funds, securities, and valuable documents of the Corporation, except as the Directors may otherwise provide. The Treasurer shall perform such duties and have such powers additional to foregoing as the Directors may designate.

4.9 Secretary. The Secretary shall have responsibility for preparing minutes of the Directors' and shareholders' meetings and for authenticating records of the Corporation. The Secretary shall perform such duties and have such powers additional to the foregoing as the Directors shall designate.

## 5. PROVISIONS RELATING TO SHARES.

5.1 Issuance and Consideration. The Board of Directors may issue the number of shares of each class or series authorized by the Articles of Organization. The Board of Directors may authorize shares to be issued for consideration consisting of any tangible or intangible property or benefit to the Corporation, including cash, promissory notes, services performed, contracts for services to be performed, or other securities of the Corporation. Before the Corporation issues shares, the Board of Directors shall determine that the consideration received or to be received for shares to be issued is adequate. The Board of Directors shall determine the terms upon which the rights, options, or warrants for the purchase of shares or other securities of the Corporation are issued and the terms, including the consideration, for which the shares or other securities are to be issued.

5.2 Share Certificates. The shares of the Corporation shall be represented by certificates in the form approved by the Board. At a minimum, each share certificate shall state on its face: (a) the name of the Corporation and that it is organized under the laws of the Commonwealth of Massachusetts; (b) the name of the person to whom issued; and (c) the number and class of shares and the designation of the series, if any, the certificate represents. If different classes of shares or different series within a class are authorized, then the variations in rights, preferences and limitations applicable to each class and series, and the authority of the Board of Directors to determine variations for any future class or series, must be summarized on the front or back of each certificate. Alternatively, each certificate may state conspicuously on its front or back that the Corporation will furnish the shareholder this information on request in writing and without charge. Each share certificate shall be signed, either manually or in

facsimile, by the President or a Vice President and by the Treasurer or an Assistant Treasurer, or any two officers designated by the Board of Directors, and shall bear the corporate seal or its facsimile. If the person who signed, either manually or in facsimile, a share certificate no longer holds office when the certificate is issued, the certificate shall be nevertheless valid.

5.3 Record and Beneficial Owners. The Corporation shall be entitled to treat as the shareholder the person in whose name shares are registered in the records of the Corporation or, if the Board of Directors has established a procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the Corporation as a shareholder, the beneficial owner of shares to the extent of the rights granted by a nominee certificate on file with the Corporation.

5.4 Lost or Destroyed Certificates. The Board of Directors of the Corporation may, subject to Massachusetts General Laws, Chapter 106, Section 8-405, determine the conditions upon which a new share certificate may be issued in place of any certificate alleged to have been lost, destroyed, or wrongfully taken. The Board of Directors may, in its discretion, require the owner of such share certificate, or his or her legal representative, to give a bond, sufficient in its opinion, with or without surety, to indemnify the Corporation against any loss or claim which may arise by reason of the issue of the new certificate.

## 6. CORPORATE RECORDS.

### 6.1 Records to be Kept.

6.1.1 The Corporation shall keep as permanent records minutes of all meetings of its shareholders and Board of Directors, a record of all actions taken by the shareholders or Board of Directors without a meeting, and a record of all actions taken by a committee of the Board of Directors in place of the Board of Directors. The Corporation shall maintain appropriate accounting records. The Corporation or its agent shall maintain a record of its shareholders, in a form that permits preparation of a list of the names and addresses of all shareholders, in alphabetical order by class of shares showing the number and class of shares held by each. The Corporation shall maintain its records in written form or in another form capable of conversion into written form within a reasonable time.

6.1.2 The Corporation shall keep within the Commonwealth of Massachusetts a copy of the following records at its principal office or an office of its Secretary, Assistant Secretary or registered agent:

6.1.2.1 the Corporation's Articles of Organization or Restated Articles of Organization and all amendments thereto currently in effect;

6.1.2.2 the Corporation's By-Laws or restated By-Laws and all amendments to them currently in effect;

6.1.2.3 resolutions adopted by its Board of Directors creating one or more classes or series of shares, and fixing their relative rights, preferences, and limitations, if shares issued pursuant to those resolutions are outstanding;



6.1.2.4 the minutes of all shareholders' meetings and records of all action taken by shareholders without a meeting, for the past three years;

6.1.2.5 all written communications to shareholders generally within the past three years, including the financial statements of the Corporation furnished under Section 16.20 of the MBCA for the past three years;

6.1.2.6 a list of the names and business addresses of the Corporation's current Directors and officers; and

6.1.2.7 the Corporation's most recent annual report delivered to the Massachusetts Secretary of State.

## 6.2 Inspection of Records by Shareholders.

6.2.1 A shareholder is entitled to inspect and copy, during regular business hours at the office where they are maintained pursuant to Section 6.1.2, copies of any of the records of the Corporation described in Section 6.1.2 if he or she gives the Corporation written notice of his or her demand at least five business days before the date on which he or she wishes to inspect and copy such records.

6.2.2 A shareholder is entitled to inspect and copy, during regular business hours at a reasonable location specified by the Corporation, any of the following records of the Corporation if the shareholder meets the requirements of Section 6.2.3 and gives the Corporation written notice of his or her demand at least five business days before the date on which he or she wishes to inspect and copy such records:

6.2.2.1 excerpts from minutes reflecting action taken at any meeting of the Board of Directors, records of any action of a committee of the Board of Directors while acting in place of the Board of Directors on behalf of the Corporation, minutes of any meeting of the shareholders and records of action taken by the shareholders or Board of Directors without a meeting, to the extent not subject to inspection under Section 6.2.1;

6.2.2.2 accounting records of the Corporation, but if the financial statements of the Corporation are audited by a certified public accountant, inspection shall be limited to the financial statements and the supporting schedules reasonably necessary to verify any line item on those statements; and

6.2.2.3 the record of shareholders described in Section 6.1.1.

6.2.3 A shareholder may inspect and copy the records described in Section 6.2.2 only if:

6.2.3.1 his or her demand is made in good faith and for a proper purpose;

6.2.3.2 he or she describes with reasonable particularity his or her purpose and the records he or she desires to inspect;

6.2.3.3 the records are directly connected with his or her purpose; and

6.2.3.4 the Corporation shall not have determined in good faith that disclosure of the records sought would adversely affect the Corporation in the conduct of its business.

6.2.4 For purposes of this Section 6.2, "shareholder" includes a beneficial owner whose shares shall be held in a voting trust or by a nominee on his or her behalf.

### 6.3 Scope of Inspection Right.

6.3.1 A shareholder's agent or attorney shall have the same inspection and copying rights as the shareholder represented.

6.3.2 The Corporation may, if reasonable, satisfy the right of a shareholder to copy records under Section 6.2 by furnishing to the shareholder copies by photocopy or other means chosen by the Corporation, including copies furnished through an electronic transmission.

6.3.3 The Corporation may impose a reasonable charge, covering the costs of labor, material, transmission and delivery, for copies of any documents provided to a shareholder. The charge may not exceed the estimated cost of production, reproduction, transmission or delivery of the records.

6.3.4 The Corporation may comply at its expense with a shareholder's demand to inspect the record of shareholders under Section 6.2.2.3 by providing the shareholder with a list of shareholders that was compiled no earlier than the date of the shareholder's demand.

6.3.5 The Corporation may impose reasonable restrictions on the use or distribution of records by the demanding shareholder.

6.4 Inspection of Records by Directors. A Director is entitled to inspect and copy the books, records and documents of the Corporation at any reasonable time to the extent reasonably related to the performance of the Director's duties as a Director, including duties as a member of a committee, but not for any other purpose or in any manner that would violate any duty to the Corporation.

## 7. INDEMNIFICATION OF DIRECTORS AND OFFICERS.

The Corporation shall indemnify, to the fullest extent permitted by Massachusetts law, each person who is or was a Director or officer, respectively, of the Corporation or who, while a Director or officer of the Corporation, is or was serving at the Corporation's request as a director, officer, partner, trustee, employee or agent of another domestic or foreign corporation, partnership, joint venture, trust, employee benefit plan or other entity. The Corporation shall not be obligated, however, to advance funds to pay for or reimburse expenses unless the Board of Directors authorizes such payment for or reimbursement of expenses in a particular instance pursuant to Section 8.53 of the MBCA. A Director or officer is considered to be serving an employee benefit plan at the Corporation's request if his or her duties to the Corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or

beneficiaries of the plan. “Director” or “officer” includes the estate or personal representative of a Director or officer.

8. FISCAL YEAR.

The fiscal year of the Corporation shall be the year ending with December 31 in each year.

9. AMENDMENTS.

9.1 The power to make, amend or repeal these By-Laws shall be in the shareholders. If authorized by the Articles of Organization, the Board of Directors may also make, amend or repeal these By-Laws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in the MBCA, the Articles of Organization, or these By-Laws, requires action by the shareholders.

9.2 Not later than the time of giving notice of the meeting of shareholders next following the making, amending or repealing by the Board of Directors of any By-Law, notice stating the substance of the action taken by the Board of Directors shall be given to all shareholders entitled to vote on amending these By-Laws. Any action taken by the Board of Directors with respect to these By-Laws may be amended or repealed by the shareholders.

9.3 Approval of an amendment to these By-Laws that changes or deletes a quorum or voting requirement for action by shareholders must satisfy both the applicable quorum and voting requirements for action by shareholders with respect to amendment of these By-Laws and also the particular quorum and voting requirements sought to be changed or deleted.

9.4 A By-Law dealing with quorum or voting requirements for shareholders, including additional voting groups, may not be adopted, amended or repealed by the Board of Directors.

9.5 A By-Law that fixes a greater or lesser quorum requirement for action by the Board of Directors, or a greater voting requirement, than provided for by the MBCA may be amended or repealed by the shareholders, or by the Board of Directors if authorized pursuant to Section 9.1.

9.6 If the Board of Directors is authorized to amend these By-Laws, approval by the Board of Directors of an amendment to these By-Laws that changes or deletes a quorum or voting requirement for action by the Board of Directors must satisfy both the applicable quorum and voting requirements for action by the Board of Directors with respect to amendment of these By-Laws, and also the particular quorum and voting requirements sought to be changed or deleted.

Adopted: May 13, 2019

## First Amendment to the By-Laws of J-B.A.M., Inc

Be it so resolved, the Shareholders of J-B.A.M, Inc, wish to amend the Section 5 of the J-B.A.M., Inc By-Laws per Section 9 of the aforementioned By-Laws as follows:

### Addition of a new Section 5.5

“ 5.5 Consent for Transfers of Shares. No Shareholder may transfer any Shares except and unless in compliance with these By-Laws and any regulatory requirements. Should any Shareholder wish to transfer any or all of their portion of the Shares of J-B.A.M., Inc, the Shareholder proposing the transfer must give no less than thirty (30) days notice to all non-transferring Shareholders of their intent to transfer, the number and value of the Shares proposed to be transferred, and the identity of the party to whom the shares are proposed to be transferred. Should the party proposed to receive the shares be an entity or group of entities, the identity of all constituent members or entities must be disclosed until all individuals involved as owners, members, or associated parties thereof have been named.

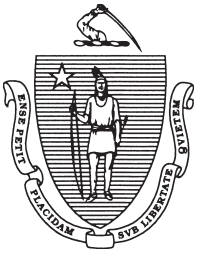
5.5.1 Upon receipt of such notice under this Section 5.5, the non-transferring Shareholders shall have a Right Of First Refusal to repurchase the Shares proposed to be transferred, either individually or on behalf of J-B.A.M, Inc, which right may be exercised at any period prior to the closing of such a transaction; or

5.5.2 Should such Right of First Refusal not be exercised by the non-transferring Shareholders prior to the closing of such proposed transaction, any proposed transfer must then receive a majority of the votes of all shareholders and full regulatory approval thereof.

5.5.3 Any such transfer under this Section 5 shall be held in escrow unless and until the necessary consents of any federal, state, or local regulatory authorities has been obtained, including but not limited to approval of a Change of Ownership and Control Request by the Cannabis Control Commission. All costs of such approval(s) are to be borne solely by the party or parties proposing such a transaction, including any license fees, application fees, and legal fees, any of which shall not be credited against the purchase price or otherwise reimbursed by the non-transferring Shareholders.

5.5.3.a The non-transferring Shareholders may require use of legal counsel, reasonably determined by the non-transferring Shareholders to be in good standing in the Jurisdiction and to be experienced in such matters with the Cannabis Control Commission to consult on and file such regulatory approvals, the reasonable and usual costs of which shall be borne solely by the party or parties proposing such a transaction, which shall not be credited against the purchase price or otherwise reimbursed by the non-transferring Shareholders. The proposed transferring party may retain independent counsel at their own additional expense to negotiate with the counsel selected by the non-transferring Shareholders, and, in the event of a disagreement between the counsels, a third, independent counsel in good standing in the Jurisdiction and experienced in such matters may be retained, whom shall be mutually acceptable to both the proposed transferring and non-transferring shareholders, the of which may be shared equally

between the parties, and the common advice of two of the three relevant counsels shall be held as controlling in any disagreement.



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: January 27, 2022

To Whom It May Concern :

I hereby certify that according to the records of this office,  
**J - B.A.M., INC.**

is a domestic corporation organized on **May 14, 2019** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

*William Francis Galvin*

Secretary of the Commonwealth

Certificate Number: 22010643240

Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by: ili



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



J-B.A.M. INC.  
71 DOWNING PKWY BLDG A  
PITTSFIELD MA 01201-3882

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

The Commissioner of Revenue certifies that, as of the date of this certificate, J-B.A.M. INC. 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  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



385989023

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

J-B.A.M. Inc  
71 DOWNING INDUSTRIAL PARK  
PITTSFIELD, MA 01201-3813

EAN: 22193516  
January 28, 2022

Certificate Id:55723

The Department of Unemployment Assistance certifies that as of 1/28/2022 ,J-B.A.M. Inc is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance





## BUSINESS PLAN

J-BAM, INC. (“J-BAM”) will be the gold standard of cannabis product manufacturing. With a currently operational, completely renovated, state-of-the-art facility in the heart of Pittsfield, a community of disproportionate impact, J-BAM is proud to be a pioneer in bringing quality cannabis products to our community. Since our founding, we have been proud to be a community-focused company – working closely with our local partners to ensure safe, regulated access to cannabis. Our team is top notch, consisting of industry participants who are successful entrepreneurs, business owners and long-time community activists.

## MISSION STATEMENT

J-BAM seeks to be on the forefront of recreational cannabis retail for the Commonwealth of Massachusetts. J-BAM was founded with a mission to provide the Commonwealth with safe, reliable, and stringently tested cannabis. J-BAM has developed its facility not only with an eye towards cultivating the highest quality product for consumers, but eventually to manufacture value-added cannabis products, as well.

## BRAND, MARKETING AND SALES NARRATIVE

J-BAM is deeply committed to our high quality products, services and the Pittsfield community. We are dedicated to hiring our staff from the talent pool in Pittsfield and supporting the town with jobs and opportunities. J-BAM will be working with Pittsfield community organizers and local stakeholders to ensure that we are reaching a diverse applicant pool when it comes to hiring, and building relationships in Pittsfield. J-BAM will sponsor community cannabis meetings and will be an active participant in educational outreach programs. Our marketing materials will comply with the CCC and state regulations. Additionally, our logo and all future marketing materials will not use cartoons or in any way appeal to children. We are dedicated to educating our consumers and the community on the health benefits of cannabis, and we work tirelessly to prohibit and dissuade use by non-adults. J-BAM looks forward to working with the community to remain the model of how a world-class facility should operate when bringing high-quality products to our neighbors in Pittsfield.

### Sales Narrative

J-BAM will use cannabis grown by their currently-held cannabis cultivation license to supply the manufacturing needs, supplemented by cannabis purchased from licensed growers across the Berkshires and the Commonwealth. Our competitive advantage will be reasonable prices, excellent customer service, and an easily accessible ordering system for retail licensees.

We plan to begin with kief, solventless extracts, and rosin, as well as infused flower and infused prerolls. There is a strong and growing demand in the marketplace for these products. Later, we may seek to expand to solvent-based concentrates and edibles but that will be in a further phase of development.



## Policy for Restricting Access to Age 21 and Older

### Cultivation

J-B.A.M, Inc.'s operations will be compliant with all regulations outlined in 935 CMR 500.000 et. seq. ("the Regulations") and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission ("CNB") or any other regulatory agency. J-B.A.M, Inc's management and security teams are responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of the facility are over the age of 21.

The purpose of this policy is to outline the responsibilities of the Company, the Company's management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that access to our facility is restricted to only persons who are 21 years of age or older.

#### Definitions:

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**Law Enforcement Authorities** means local law enforcement unless otherwise indicated.

**Marijuana Establishment Agent** means a board member, director, employee, executive, manager, or volunteer of a Marijuana Establishment, who is **21 years of age or older**. Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

**Visitor** means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, provided, however, that **no such individual shall be younger than 21 years old**.

For the purposes of this Policy the term "facility" also refers to any vehicle owned, leased, rented or otherwise used by J-B.A.M, Inc for the transportation of Marijuana. Our cultivation facility allows only the following individuals access to our facility:

1. J-B.A.M, Inc Agents (including board members, directors, employees, executives, managers, or volunteers) must have a valid Agent Registration Card issued by the Commission and all of J-

B.A.M, Inc Agents will be verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.

2. All J-B.A.M, Inc visitors (including outside vendors and contractors) prior to being allowed access to the facility or any Limited Access Area must produce a Government issued Identification Card to a member of the management team and have their age verified to be 21 years of age or older. If there is any question as to the visitors age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access. After the age of the visitor has been verified, they will be given a Visitor Identification Badge. Visitors will always be escorted by a marijuana establishment agent that is authorized to enter the limited access area. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exiting the facility. The visitor log will always be available for inspection by the Commission.
3. J-B.A.M, Inc will ensure that the following individuals listed below will be granted immediate access to the Marijuana Establishment or Marijuana Establishment transportation vehicle:
  - a. Agents of the Commission;
  - b. Commission Delegees;
  - c. State and Local Law enforcement Authorities acting within their lawful jurisdictions;
  - d. Police and Fire departments, and emergency medical services acting in the course of their official capacity.



## Quality Control and Testing Policy and procedure

J-B.A.M. is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”) or any other regulatory agency. This policy has been created to provide clear and concise instructions for all our employees to maintain Quality Control and Testing procedures that are in compliance with the Regulations.

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### **Definitions:**

**Production Batch** means a discrete batch of Marijuana Products being processed. The marijuana licensee shall assign and record a unique, sequential alphanumeric identifier to each Production batch for the purposes of production tracking, product labeling and product recalls.

**Independent Testing Laboratory** means a laboratory that is licensed by the Commission and is:

- (a) Accredited to the International Organization for Standardization 17025 (ISO/IEC 17025: 2017) by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission;
- (b) Independent financially from any Medical Marijuana Treatment Center (MTC), Marijuana Establishment or licensee for which it conducts a test; and
- (c) Qualified to test cannabis or marijuana in compliance with 935 CMR 500.160 and M.G.L. c. 94C, § 34.

**Marijuana** means all parts of any plant of the genus Cannabis, not excepted in (a) through (c) and whether growing or not; the seeds thereof; and resin extracted from any part of the plant; clones of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1; provided that cannabis shall not include:

- (a) the mature stalks of the plant, fiber produced from the stalks, oil, or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil, or cake made from the seeds of the plant or the sterilized seed of the plant that is incapable of germination;

(b) hemp; or

(c) the weight of any other ingredient combined with cannabis or marijuana to prepare topical or oral administrations, food, drink or other products.

**Process or Processing** means to manufacture cannabis products

**Production Batch** means a batch of material, made at the same time, using the same methods, equipment and ingredients. The licensee shall assign and record a unique, sequential alphanumeric identifier to each production batch for the purposes of production tracking, product labeling and product recalls. All production batches shall be traceable to one or more cannabis or marijuana manufacturing batches.

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J-B.A.M. is committed to cultivating healthy, high quality, and disease-free marijuana products. Contaminants such as mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 500.120(5) for use on marijuana and mildew are the biggest threat to a marijuana facility and its products. J-B.A.M. is committed to utilizing Best Management Practices (“BMP”) for the prevention and treatment of possible contaminants using the safest and least invasive means.

J-B.A.M. will also implement an industry standard Integrated Pest Management (“IPM”) program focusing on preventing pest problems. Preventing pest problems in our manufacturing facility will entail minimizing pest access to the facility and the food and shelter available to it. Consequently, IPM relies heavily on the cooperation and participation of all employees. Also, quality control and the testing of marijuana products are essential for the operation of J-B.A.M.’s manufacturing facility. J-B.A.M. will utilize best industry practices when it comes to quality control and product testing.

Quality Control will be maintained through the strict adherence to Good Manufacturing Practices and compliance with 935 CMR 500.000 et. seq, 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*, the sanitation requirement in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine*.

All products that J-B.A.M. will sell or transfer to other Marijuana Establishment will be tested in accordance with the regulations and this policy. J-B.A.M. will not sell or otherwise market marijuana for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.

J-B.A.M. 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 those related to water quality and solid and hazardous waste management, prior to obtaining a final license under 935 CMR 500.103(2). J-B.A.M. will adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under section 78(b) of St. 2017, c. 55, 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. These energy efficiency and equipment standards include:

1. The building envelope for our facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), International

Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*, 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.

2. The Lighting Power Densities (LPD) for our manufacturing space will not exceed an average of 36 watts per gross square foot of active and growing space canopy, unless otherwise determined in guidelines issued by the Commission.
3. Our Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: *State Building Code*).
4. We will establish documented safety protocols to protect workers and consumers (e.g., eye protection near operating grow light).
5. J-B.A.M. understands and acknowledges that the Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55, § 78(b), including but not limited to provisions for greenhouses and agricultural buildings.

### **Quality Control – Sanitation Standard Operating Procedure (SOP)**

#### Facility

J-B.A.M.'s manufacturing facility ("the facility") will be designed and constructed with safe food handling and sanitation in mind. All equipment in the facility will comply with the design and construction standards of appropriate nationally recognized standards and/or code requirements and bear the certification mark of an ANSI accredited organization (e.g. NSF, UL, ETL).

Only the leaves and flowers of the female marijuana plant will be processed for manufacture in a safe and sanitary manner as prescribed below:

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

The facility sanitation requirements are outlined below:

1. All product contact surfaces are smooth, durable and easily cleanable. The walls, ceiling and floors of all manufacturing, processing and storage areas are constructed of materials that are smooth, durable and can be adequately kept clean and in good repair. There must be coving at base

junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.

2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the production of safe marijuana products.
3. Floor drains and floors are effectively sloped and designed prevent pooling water. Drains have proper grating to prevent blockage and stopping of drains.
4. Overhead fixtures, ducts and pipes are designed as to prevent drips or condensate from potential contamination of marijuana products or marijuana products-packaging materials. Piping and conduit is at least 25 mm (2.5 cm) from the walls and ceilings.
5. Aisles or working spaces are provided between equipment and walls and are adequately unobstructed and of adequate width to permit employees to perform their duties and to protect against contaminating infused or marijuana products or infused or marijuana products- contact surfaces with clothing or personal contact.
6. Lighting and light fittings are shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over manufacturing, processing or storage areas or otherwise protect against marijuana product contamination in case of glass breakage. Suspended lighting is constructed from non- corrodible and cleanable assemblies. Adequate lighting will be installed in hand-washing areas, dressing and locker rooms, and toilet rooms and in all areas where infused or marijuana products are examined, processed, or stored and where equipment or utensils are cleaned. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers. J-B.A.M. will ensure adequate safety lighting in all production, processing and storage areas, as well as areas where equipment or utensils are cleaned.
7. Buildings, fixtures, and other physical facilities are constructed in such a manner that allow them to be maintained in a sanitary condition.
8. Adequate ventilation or control equipment are installed to minimize odors and vapors (including steam and noxious fumes) in areas where they may contaminate marijuana products. Fans and other air-blowing equipment shall be operated in a manner that minimizes the potential for contaminating infused or marijuana products, infused or marijuana products-packaging materials, and infused or marijuana products-contact surfaces.
9. Handwashing facilities are adequate and convenient and shall be furnished with running water at a suitable temperature. Handwashing will be located in all production and processing areas and where good sanitary practices require employees to wash and sanitize their hands. J-B.A.M. will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
10. The facility water supply comes from the City of Pittsfield municipal water supply and is sufficient for necessary operations. The facilities plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There are no cross-connections between the potable and wastewater lines. The facility



will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.

11. All storage areas are constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

### **Contamination Control**

1. All entrance and exit doors to the facility are self-closing and rodent proof. Vinyl split curtains will prevent insects and microbial contaminants from entering the building when doors are in use. Insect screening, HEPA, and carbon filters will prevent pest and microbial contaminants from entering through vents and exhaust from the outside. Indoor only footwear has been issued to all employees to cut down on dust and debris contamination.
2. Employee and visitor gowning will be required. Employees are required to change out of their street clothes and footwear into uniforms and footwear dedicated to the facility, either scrubs or sterile clothing. Visitors are required to secure personal belongings and don sterile clothing or suits and disposable boot covers.
3. Training: All employees are trained on pest prevention, pest management, pest detection, and pest treatments.
4. Traps for monitoring: Small sticky traps for monitoring of flying or airborne pest shall be posted, mapped and levels of any pest monitored/documented.
5. Handling and storage of marijuana product or marijuana plant waste: All marijuana plant waste will be placed in the "Marijuana Waste" container located in each manufacturing and processing area. This container must be impervious and covered at all times. At the end of every day, the "Marijuana Waste" container must be emptied, and the contents transferred to the Marijuana Waste Room. All plant waste will be stored in the waste room in sealed containers until disposal.
6. All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles; Recyclable, Organic and Solid Waste. At the end of every day these containers are emptied, and the contents removed from the building and placed in the appropriate containers to await pickup.
7. 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
8. All toxic materials including cleaning compounds, pesticides, sanitizers, etc. are held and stored in an area away from production, processing and storage areas to protect against contamination of marijuana.

### **Sanitation**

All marijuana products are prepared, handled, and stored in compliance with;

- The sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*;

- The sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*; and
  - The requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*
1. Storage- Separate storage rooms are utilized for finished marijuana products.
  2. Hand Washing- The facility will have a separate handwashing sink; hand drying device, or disposable towels; supply of hand cleaning agent; and waste receptacle for each processing, production, utensil washing area, and toilet room.
    - a. Sinks used for product preparation or for washing equipment or utensils shall not be used for handwashing.
    - b. Each handwashing sink will be provided with hot and cold water tempered by means of a mixing valve or a combination faucet to provide water at a temperature of at least 110 degrees Fahrenheit.
    - c. Handwashing sinks are of sufficient number and conveniently located for use by all employees in the production, processing and utensil washing areas. Handwashing sinks are easily accessible and may not be used for purposes other than handwashing.
  3. Toilet Room- A toilet room shall be available for use by all workers. Ventilation will be provided by mechanical means. A soap dispenser and disposable towels shall be provided for hand washing in toilet rooms.
  4. Manual Cleaning and Sanitizing- For manual cleaning and sanitizing of equipment and utensils, a ultrasonic cleaner will be used.
    - a. The sanitizing compartment shall be large enough to hold the largest piece of equipment.
    - b. Manual Sanitizing Procedure
      - i. Clean any gross solids off the equipment and dispose of them in appropriate waste receptacle.
      - ii. Disassemble any equipment as necessary to clean all surfaces.
      - iii. Place the equipment in the ultrasonic cleaner.
      - iv. Operate the ultrasonic cleaner according to all use instructions.
      - v. Dry any equipment if necessary
      - vi. Re-assemble the equipment.
    - c. Product Preparation Surfaces- These surfaces are cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
      - i. Prescrape surface to remove gross soils.
      - ii. Wash surface with recommended strength solution of pot & pan detergent.
      - iii. Rinse with water and wipe dry.

- iv. Using trigger sprayer bottle and a different wiping cloth, apply sanitizing solution of sanitizer.
  1. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds and allow to air dry.

## **Personnel**

1. Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of marijuana products, production or processing surfaces, or packaging materials becoming contaminated, shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.
  - a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Board of Health.
  - b. J-B.A.M. will voluntarily comply with any and all isolation and/or quarantine orders issued by the Board of Health, the Department of Public Health of the Commission.
  - c. J-B.A.M. Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.
    - i. Agents may be re-assigned to activities so that there is no risk of transmitting a disease through food/product.
2. J-B.A.M. Agents shall conform to sanitary practices while on duty, including:
  - a. Maintain adequate personal cleanliness:  
Grooming:
    - i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.
    - ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
      - a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
    - iii. Wash hands (including under fingernails) and up to forearms vigorously and thoroughly with soap and warm water for a period of 20 seconds:
      - When entering the facility before work begins.

- Immediately before preparing or processing products or handling equipment.
  - As often as necessary during manufacturing or product preparation when contamination occurs.
  - In the restroom after toilet use and when you return to your work station.
  - When switching between working areas.
  - After touching face, nose, hair, or any other body part, and after sneezing or coughing.
  - After cleaning duties.
  - Between each task performed and before wearing disposable gloves.
  - After eating or drinking.
  - Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, picking up a dropped item, etc.
- a. Wash hands only in hand sinks designated for that purpose.
  - b. Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- i. Wear appropriate clothing – clean uniform with sleeves and clean non-skid close-toed work shoes (or leather tennis shoes) that are comfortable for standing and working on floors that can be slippery.
- ii. Wear apron or lab coat on site, as appropriate.
  - Do not wear apron or lab coat to and from work.
  - Take off apron or lab coat before using the restroom.
  - Remove apron or lab coat when leaving the production or processing area.
  - Change apron or lab coat if it becomes soiled or stained.
- iii. Wear disposable gloves with any cuts, sores, rashes, or lesions.
- iv. Wear gloves when handling products or product ingredients that will not be heated-treated.
- v. Wear gloves when packaging products.
- vi. Change disposable gloves as often as handwashing is required. Wash hands before donning and after discarding gloves.

Hair Restraints and Jewelry:

- i. Wear a hair net or bonnet in any food/product production or processing area so that all hair is completely covered.
- ii. Keep beards and mustaches neat and trimmed. Beard restraints are required in any food/product production or processing area.
- iii. Refrain from wearing jewelry in the food/product production and processing area.
  - Only a plain wedding band.
  - No necklaces, bracelets, or dangling jewelry are permitted.
  - No earrings or piercings that can be removed are permitted.

Cuts, Abrasions, and Burns:

- i. Bandage any cut, abrasion, or burn that has broken the skin.
- ii. Cover bandages on hands with gloves and finger cots and change as appropriate.
- iii. Inform supervisor of all wounds.

Smoking, eating, and gum chewing:

- i. J-B.A.M. facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- ii. Eat and drink in designated areas only. A closed beverage container may be used in the production area if the container is handled to prevent contamination of 1) the employee's hands, 2) the container, and 3) exposed product, clean equipment and utensils.
- iii. Refrain from chewing gum or eating candy during work in a food/product production or processing area.

**HACCP- Hazard Analysis and Critical Control Point**

J-B.A.M. will implement a HACCP plan in accordance with *the HACCP Principles & Application Guidelines* issued by the FDA. This HACCP plan will address the processing, production and packaging of all marijuana products that J-B.A.M. will manufacture. Once operational J-B.A.M. will:

1. Assemble the HACCP team.
2. Describe the product and its distribution.
3. Describe the intended use and consumers of the product.
4. Develop a flow diagram which describes each process.
5. Verify the flow diagram.
6. Conduct a hazard analysis for each product (Principle 1).
7. Determine critical control points (CCPs) for each product (Principle 2).
8. Establish critical limits (Principle 3).

9. Establish monitoring procedures (Principle 4).
10. Establish corrective actions (Principle 5).
11. Establish verification procedures (Principle 6).
12. Establish record-keeping and documentation procedures (Principle 7).

### **Training**

J-B.A.M. will provide training and training opportunities to all of its employees. In addition to required training, J-B.A.M. will encourage advanced training to all employees in the areas of Plant Safety, Safe Manufacturing Processes, Good Manufacturing Practices and HACCP.

1. All employees will be trained on basic plant safety prior to or during the first day of employment.
  - a. Include basic product safety training as part of new employee orientation.
  - b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
  - c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
  - d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.
2. All employees engaging in the trimming or packaging will be trained and certified in;
  - a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on plant safety, Good Manufacturing Practices and HACCP.
4. Monthly in-service training.
5. Require all managers to be Certified Food Protection Managers (CFPM) by completing a SERVSAFE or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide plant safety and HACCP training.
7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance.
9. File documentation in HACCP records.

### **Testing of Marijuana**

No marijuana may 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. Testing of marijuana shall be performed by an Independent Testing Laboratory in compliance with the protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical*

*Marijuana Products and Marijuana-infused Products.* Testing of 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.

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.

J-B.A.M. will contract with a Licensed Independent Testing Laboratory to test all marijuana batches prior to packaging to ensure contaminant-free purity and correct dosage and potency. We have begun discussions with several Marijuana Testing laboratories which are Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. Any Laboratory that J-B.A.M. contracts with will be Licensed by the Commission prior to J-B.A.M. contracting them for testing services.

1. This testing lab will pick up and transport our testing samples to and from their lab. This transportation will comply with J-B.A.M. policies and procedures and 935 CMR 500.105(13) if applicable.
2. J-B.A.M. will ensure that the storage of all marijuana products at the laboratory complies with 935 CMR 500.105(11).
3. Any and all excess J-B.A.M. marijuana product samples used in testing will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to J-B.A.M. facility for disposal or by the Independent Testing Laboratory disposing of it directly.

J-B.A.M. will not sell or otherwise market for adult use any Marijuana that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Pursuant to 935 CMR 500.130(4) J-B.A.M. will provide documentation of our compliance, or lack thereof, with the testing requirements, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect Marijuana against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation to all marijuana establishments that we sell or otherwise transfer marijuana to.

Required testing includes:

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

J-B.A.M. will maintain the results of all testing for no less than one year. All testing results shall be valid for one year.

All testing will be conducted in accordance with the frequency required by the Commission.

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

If a laboratory test result indicates that a J-B.A.M. marijuana product sample has contaminant levels above the acceptable limits established in the Commission protocols identified in 935 CMR 500.160(1) – J-B.A.M. will:

1. Immediately segregate the manufacturing or production batch and evaluate next steps.
  - a. Using the flow chart below (*Actions in Response to Laboratory Analytical Results*), the Manufacturing Manager and CEO will determine whether to:
    - i. Retest the Manufacturing/Production Batch
    - ii. Remediate the Manufacturing/Production Batch, if applicable and allowed
    - iii. Dispose of Manufacturing/Production Batch
2. If the test result indicates has a contaminant level for Pesticides that is above the acceptable limits the Production Batch will be immediately disposed of.
3. If it is determined that the Production Batch cannot be remediated, it will be disposed of.
  - a. J-B.A.M. Manufacturing Manager or CEO will:
    - i. Notify the Commission within 72 hours of the laboratory testing results indicating that the contamination cannot be remediated and is being disposed of;
    - ii. Notify the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission
    - iii. This notification to the Commission will describe the proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
4. In the case of any test result that indicates that a J-B.A.M. marijuana product sample has contaminant levels above the acceptable limits, the Manufacturing Manger and CEO will conduct an assessment of the source of the contamination.
  - a. This extensive assessment will include investigating all possible sources of contamination including water, media, nutrients, environmental conditions and employee factors.
  - b. The assessment should include a corrective action plan and be shared as a training tool with all J-B.A.M. Agents.
5. Marijuana submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same



Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

### **Miscellaneous Marijuana Testing Requirements**

1. Clones are subject to these testing provisions but are exempt from testing for metals.
2. All transportation of Marijuana to and from Independent Testing Laboratories providing Marijuana testing services will comply with 935 CMR 500.105(13).
3. All storage of Marijuana at a laboratory providing Marijuana testing services shall comply with 935 CMR 500.105(11).
4. All excess Marijuana must be disposed of in compliance with 935 CMR 500.105(12) by the Independent Testing Laboratory disposing of it directly.
5. J-B.A.M. will not sell or otherwise market Marijuana for adult use that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

### **Environmental Media Testing**

1. All source soils and solids shall be sampled and analyzed prior to use in manufacturing.
2. All source soils and solids shall be sampled and analyzed whenever a new source material is utilized (e.g., different source soil location or different source solid manufacturer).
3. All source soils and solids for initial use must be sampled at the rate of one (1) sample per cubic yard of solid environmental media/soil.
4. Source soils and solids passing initial testing requirements may be stockpiled for later use without requiring re-analysis unless;
  - a. The stockpile has been contaminated or altered while stored.
5. Situations for re-analysis may include but are not limited to soils that have been;
  - a. Amended;
  - b. Mixed with other source soils/solids;
  - c. Subject to pesticide application;
  - d. Used for other purposes; or
  - e. Inundated by flood waters.

Supplies Needed: Sample Form, Chain of Custody, Pen, Marker and Sample Container (provided by CDX Labs)

### **Sampling of Environmental Media for Testing**

This procedure applies to all environmental media that is required to be tested in accordance with the Regulations.

Water will be sampled and analyzed prior to use for manufacturing of marijuana and quarterly thereafter.

Quality assurance is responsible for all product sampling to meet the compliance criteria. J-B.A.M. has contracted with NE Labs for the purposes of testing all of our environmental media and water. Follow the process outlined in the *“Sampling Instructions for Massachusetts DPH Medical Marijuana Program”* form from NET Labs.

Supplies Needed: Sample Form, Chain of Custody, Pen. Marker, Ziploc bag

1. Label
  - a. Label each Ziploc bag with the sample ID, date and time of sampling, and sampler’s initials.
2. Fill out the Chain of Custody
  - a. List the same info on the chain of custody
  - b. One sample ID goes on one line
  - c. Check the appropriate boxes
  - d. Make sure date and time stamp are filled in
3. Sampling
  - a. Fill the Ziploc sample bag with 8 oz. of soil/media
  - b. Tightly seal the sample bag
4. Storing Sample
  - a. Store samples in a cool, dry location until samples are picked up by a NET Lab courier.
5. Quality Assurance will perform routine audits and analysis of report from the testing lab.

### **Sampling of Water for Testing**

This procedure applies to all water that is required to be tested in accordance with the Regulations.

The Quality Assurance Manager is responsible for all water sampling to meet the compliance criteria. J-B.A.M. has contracted with NE Labs for the purposes of testing all of our water. In compliance with the Regulations and the *“Protocol for sampling and analysis of environmental media for Massachusetts Registered Medical Marijuana Dispensaries”* J-B.A.M. will sample and test its water supply prior to use for manufacturing of marijuana and quarterly thereafter. Following the process outlined in the *“Sampling Instructions for Marijuana Testing”* form below from NET Labs.

Samples will be taken at the location closest to manufacturing area prior to any water treatment and immediately following any treatment systems.

We will test our water for the following contaminants;

1. Metals;

2. Pesticides; and
3. Bacteriological

### **Collecting Water Samples**

1. Samples should not be collected during any periods of unusual activity such as draining of water lines, immediately after changing treatment cartridges or replenishing of hydroponic nutrient solutions.
2. Prior to Sample Collection. The QA Manager or designee will assemble all equipment and information needed before beginning.
  - a. Items to assemble before sampling include, but are not limited to, the following:
    - i. Sample collection plan or diagram of locations to ensure representative sample collection
    - ii. Logbook or sample collection forms
    - iii. Chain-of-custody forms (COCs) (See below)
    - iv. Disposable gloves
    - v. Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
    - vi. Sample containers appropriate for the analyses required;
      1. These will be supplied by the lab.
    - vii. Container labels and pen with indelible ink; and
    - viii. Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples;
  - b. Sample collection personnel will create a new entry for each sampling event in the sample collection logbook.
  - c. Sample collection documentation should identify the sample collection date and start time, participating personnel and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used.
  - d. Sample collection personnel shall identify or determine the number and location of water samples to be collected
    - i. Sample locations must be recorded in the sample collection logbook. Record the sample location identifier (location ID) for each sample so that it can be utilized to identify the physical location of the sample location within the facility.

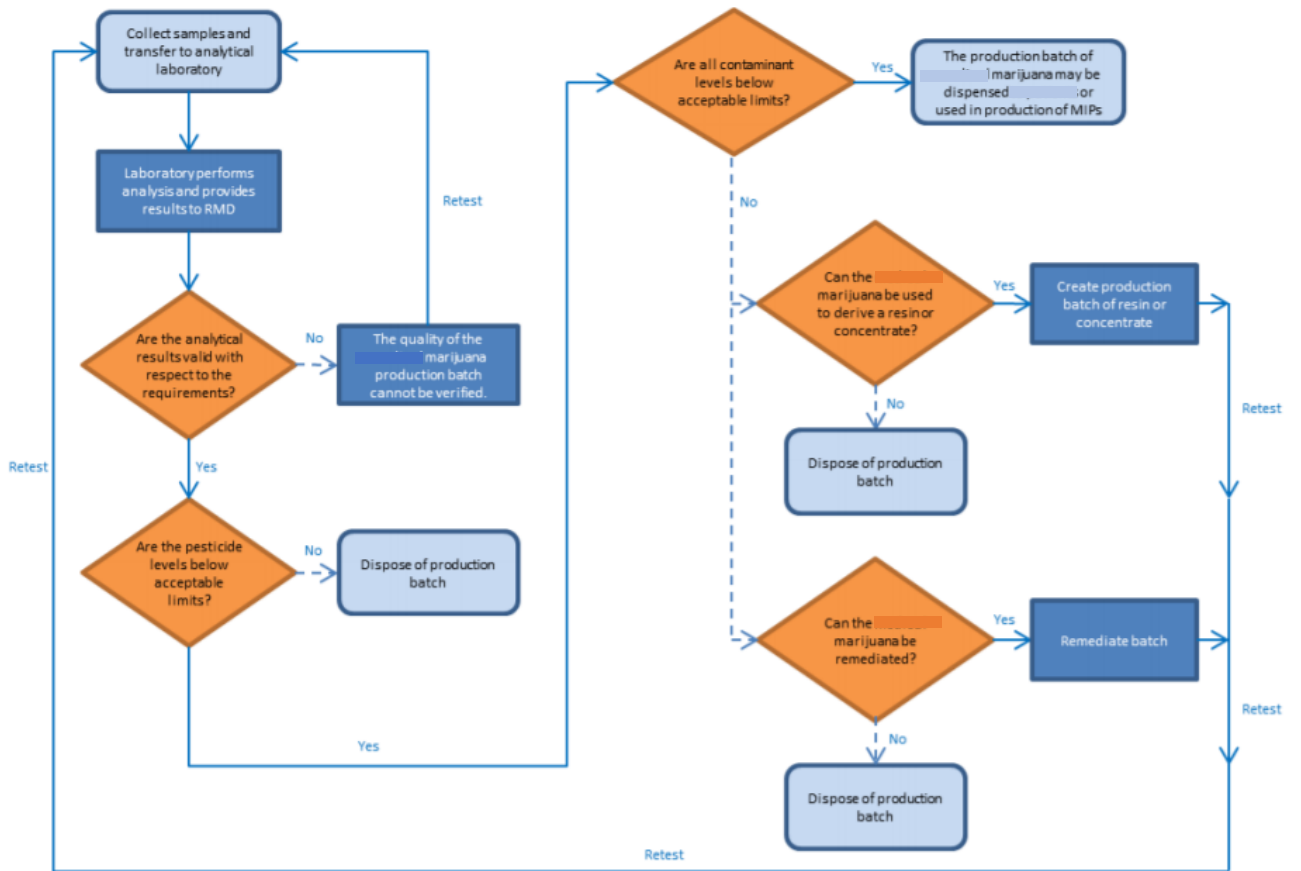
- ii. Location identifiers should be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample).
    - iii. In addition to the location ID, create a unique sample ID for each sample. Sample identifiers should be unique for a given sample event. Record the location and sample IDs in the sample collection logbook or forms as well as the volume of the sample, preservation, and associated sample containers.
  - e. Any tools that contact the samples should be made of stainless steel or other inert material to avoid potential contamination of the sample. In addition, all tools that come in contact with the sample media should be rinsed with deionized water between samples to reduce potential cross contamination.
  - f. Preparing sample labels and affixing them to sample containers immediately before sampling.
    - i. Information to include on the label includes at a minimum the location and sample ID and date/time of collection. Additional information that must be recorded in documentation if not on the label includes sample collector's name, environmental media type, collection method, whether the sample is a grab or composite sample, and preservation (if applicable).
- 3. Sample Collection. Collect the planned samples from each sample location one at a time:
  - a. Don gloves to mitigate potential for contamination of samples.
  - b. Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.
  - c. Prepare the sample location by removing faucet aerators if connected. Note the location of any water treatment systems and remove if required to represent pre-treatment location.
  - d. For sample collection of water lines, purge the lines of standing water and note purge time in sample collection documentation. Generally, for frequently used water 15 minutes run time is considered sufficient but actual time for purge depends on pipe volume and frequency of use.
  - e. Open the pre-labeled sample containers appropriate for the analyses taking care to not allow errant drips or splashes off other surfaces to enter the caps or containers.
  - f. Samples for all analyses may be collected directly into sample containers or into a larger, inert vessel then poured into containers. During sample collection, make sure than the tap or spigot does not contact the sample container.
  - g. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.

- h. Samples should be refrigerated or maintained on ice until shipped to the analytical laboratory.
  - i. Chain-of-custody paperwork should be completed immediately prior to shipment.
4. Sample Handling
- a. After samples are properly collected and labeled, they should be delivered for analysis as soon as possible. This section describes how to handle, securely store, package, and ship the samples to the laboratory.
  - b. Sample containers both empty and once containing samples shall be stored in a contaminant-free environment to the degree possible. Sample containers should not be stored for more than one (1) year.
  - c. All samples should be collected and stored in containers of the appropriate materials based on the analysis method being performed.
  - d. Until the samples are analyzed, they should be preserved to minimize chemical or physical changes according to the analytical method references.
5. Sample Storage
- a. Samples should be refrigerated or maintained on ice ( $4\text{ }^{\circ}\text{C} \pm 2^{\circ}\text{C}$ ) until they are shipped to the analytical laboratory.
  - b. Placing the samples in airtight containers with minimal headspace preserves samples by minimizing moisture loss and chemical exchange between the sample medium and air.
  - c. In addition, protect the samples from excessive light exposure to minimize photochemical degradation. Samples can be protected from light by using an amber sample container, storing the samples in a closed box or other amber container, or in a dark storage location.
  - d. To be considered valid, all samples must be analyzed prior to expiration of the technical holding time as defined in each analytical method. Note that the holding time for some biological components is very short; 24 to 48 hours from the time of collection.

#### **Quality Control (QC)**

1. Field duplicate samples shall be collected at least annually and one (1) for every twenty (20) field samples of the solid samples collected.
2. Field duplicate samples shall be collected and analyzed for each analytical method performed on the samples.
3. Field duplicate samples will not be identified to the laboratory (blind QC).

## Actions in Response to Laboratory Analytical Results





# J-B.A.M Personnel and Background Check Policy

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## **Intent**

To provide clear and concise instructions for J-B.A.M employees regarding Personnel Policies that are compliant with the regulations.

J-B.A.M is committed to being compliant with all regulations outlined in 935 CMR 500.000, et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”) or any other regulatory agency.

## **Purpose**

The purpose of this policy is to outline the responsibilities of the company, the company’s management team and agents to ensure specific, methodical, and consistent compliance of the regulations and to ensure that our personnel policies are compliant will all relevant regulations and laws.

## **Personnel Records**

J-B.A.M will maintain the following information in personnel records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each J-B.A.M agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with J-B.A.M and shall include, at a minimum, the following:
  - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - b. Documentation of verification of references;
  - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - d. 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;
  - e. Documentation of periodic performance evaluations;
  - f. A record of any disciplinary action/performance issues; and
  - g. Notice of completed responsible vendor and eight-hour related duty training.

3. A staffing plan that will demonstrate accessible business hours
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with 935 CMR 500.030.

These personnel records will be held electronically and in hard copy. The electronic records will be stored in a secure server with encryption software that protects against unauthorized access to the files. Access to the electronic records will only be allowed to J-B.A.M management agents who require access. as part of their job duties. Hard Copy (written records) will be stored in a secure, locked cabinet in a locked room accessible to only J-B.A.M Management agents who require access. These records will be made available for inspection by the Commission upon request.

### **J-B.A.M Agents**

All J-B.A.M board members, directors, employees, executives, managers and volunteers will register with the Commission as an J-B.A.M Marijuana Establishment Agent (“J-B.A.M Agent”). For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Cultivation Establishment directly related to the production, packaging, storage, testing, or dispensing of marijuana.

All J-B.A.M Agents shall:

1. Be 21 years of age or older;
2. Not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

J-B.A.M will submit to the Commission an application for every J-B.A.M Agent, this application will include;

1. The full name, date of birth, and address of the individual;
2. All aliases used previously or currently in use by the individual, including maiden name, if any;
3. A copy of the applicant’s driver’s license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
4. An attestation that the individual will not engage in the diversion of marijuana products;
5. Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
  - a. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
  - b. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or an Other Jurisdiction, relating to any professional or occupational or fraudulent practices; 3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a



- renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
- c. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
  - d. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or an Other Jurisdiction, with regard to any professional license or registration held by the applicant; and
6. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
  7. Any other information required by the Commission.

J-B.A.M's agents will register with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and will submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom J-B.A.M seeks a marijuana establishment agent registration which was obtained within 30 days prior to submission.

J-B.A.M will notify the Commission no more than one business day after any J-B.A.M agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

The Agent registration card is valid for one year from the date of issue, J-B.A.M will renew each J-B.A.M Agent Registration Card on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

After obtaining a registration card for an J-B.A.M Agent registration card, J-B.A.M will notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

All agents will carry the registration card at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

### **Background Checks**

J-B.A.M will comply with all Background Check requirements in the regulations and any other sub-regulatory guidance issued by the Commission.

1. **Application Process-** During the application process J-B.A.M will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;
  - a. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (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);
  - b. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:

- i. The individual's full legal name and any aliases;
  - ii. The individual's address;
  - iii. The individual's date of birth;
  - iv. A photocopy of the individual's driver's license or other government-issued identification card;
  - v. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;
  - vi. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
2. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
  - a. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing Marijuana for medical- or adult-use purposes, in which those individuals either owned shares of stock or served as board member, Executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
  - b. a description and the relevant dates of any civil action under the laws of the Commonwealth, or an Other Jurisdiction including, but not limited to, a complaint relating to any professional or occupational or fraudulent practices;
  - c. a description and relevant dates of any past or pending legal or enforcement actions in the Commonwealth or any other state against an entity whom the applicant served as a Person or Entity Having Direct or Indirect Control, related to the cultivation, Processing, distribution, or sale of Marijuana for medical- or adult-use purposes;
  - d. a description and the relevant dates of any administrative action with regard to any professional license, registration, or certification, including any complaint, order, stipulated agreement or settlement, or disciplinary action, by the Commonwealth, or like action in an Other Jurisdiction including, but not limited to, any complaint or issuance of an order relating to the denial, suspension, or revocation of a license, registration, or certification;
  - e. a description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by an Other Jurisdiction with regard to any professional license, registration, or certification, held by any Person or Entity Having Direct or Indirect Control, if any;
  - f. a description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any Person or Entity Having Direct or Indirect Control that is part of the applicant's application, if any; and
  - g. any other information required by the Commission.

J-B.A.M will not present any individual in our application whose background check will result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table A of 935 CMR 500.801.

- 3. Background Checks not included in the Application Process-** For all Marijuana Establishment Agent Registrations not included in the application process J-B.A.M will submit Marijuana Establishment Agent applications for all required individuals. J-B.A.M will perform its own due diligence and perform background checks, including a CORI report, in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table B: Retail and Transporter Marijuana Establishment Agents, under 935 CMR 500.802.

### **Equal Opportunity Employment Policy**

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

J-B.A.M expects all employees to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination and harassment and to accommodate others in line with this policy to the fullest extent required by law. For example, J-B.A.M will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on J-B.A.M operations. If an employee desires a religious accommodation, they are required to make the request in writing to their manager as far in advance as possible. Employees requesting accommodations are expected to attempt to find co-workers who can assist in the accommodation (e.g. trade shifts) and cooperate with J-B.A.M in seeking and evaluating alternatives.

Moreover, in compliance with the Americans with Disabilities Act (ADA), J-B.A.M provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. J-B.A.M may require medical certification of both the disability and the need for accommodation. Keep in mind that J-B.A.M can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual. Therefore, it is the employees' responsibility to come forward if they are in need of an accommodation. J-B.A.M will engage in an interactive process with the employee to identify possible accommodations, if any will help the applicant or employee perform the job.

### **Anti-Harassment and Sexual Harassment Policy**

J-B.A.M will promote a workplace that is free from discrimination and harassment, whether based on race, color, gender, age, religion, creed, national origin, ancestry, sexual orientation, marital status or disability. Inappropriate interference with the ability of J-B.A.M employees to perform their expected job duties will not be tolerated.

It is illegal and against J-B.A.M policy for any employee, male or female, to harass another employee. Examples of such harassment include making sexual advances or favors or other verbal or physical conduct of a sexual nature a condition of any employee's employment; using an employee's

submission to or rejection of such conduct as the basis for, or as a factor in, any employment decision affecting the individual; or otherwise creating an intimidating, hostile, or offensive working environment by such conduct.

The creation of an intimidating, hostile, or offensive working environment may include but is not limited to such actions as persistent comments on an employee's sexual preferences, the display of obscene or sexually oriented photographs or drawings, or the telling of sexual jokes. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory employment effect may not be viewed as harassment. J-B.A.M will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

J-B.A.M will not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit.

J-B.A.M will not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

If you feel victimized by sexual harassment you should report the harassment to your manager immediately. If your immediate manager is the source of the alleged harassment, you should report the problem to the Human Resources Department.

Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible.

Any employee who makes a complaint, or who cooperates in any way in the investigation of same, will not be subjected to any retaliation or discipline of any kind.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

**The United States Equal Employment Opportunity Commission ("EEOC")** One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.

**The Massachusetts Commission Against Discrimination ("MCAD")** One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000.

### **Americans with Disability Act**

J-B.A.M strongly supports the policies of the Americans with Disabilities Act and is completely committed to treating all applicants and employees with disabilities in accordance with the requirements of that act. J-B.A.M judge's individuals by their abilities, not their disabilities, and seeks to give full and equal employment opportunities to all persons capable of performing successfully in the company's positions. J-B.A.M will provide reasonable accommodations to any persons with disabilities who require them, who

advise J-B.A.M of their particular needs. Information concerning individuals' disabilities and their need for accommodation will of course be handled with the utmost discretion.

### **Drug/Alcohol Free Workplace**

J-B.A.M is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on J-B.A.M premises or while using J-B.A.M vehicles or equipment, or at any location during work time.

No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug.

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

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

### **Smoke Free Workplace**

Smoking is prohibited throughout the workplace. This policy applies equally to all employees, clients, partners, and visitors.

### **Employee Assistance Policy**

To help employees in circumstances where counseling services would be helpful, J-B.A.M will make an Employee Assistance Program (EAP) counseling service available to employees, when needed, at no personal cost.

### **Employee Diversion of Marijuana**

If a J-B.A.M Agent is found to have diverted marijuana, that agent will immediately be dismissed and have their Marijuana Establishment Registration Card confiscated. The Director of HR will immediately be notified. The Director of HR will make a detailed report of the event and report it to local law enforcement and the Commission within 24 hours.

### **Employee Handbook**

J-B.A.M will provide a comprehensive employee handbook to all employees that will outline all the information pertinent to their employment with J-B.A.M. These subjects will include, but not be limited to;

1. J-B.A.M Mission and Vision
2. Organizational Structure
3. General Employment Policies

4. Employee Categories
5. Conflicts of Interest
6. Access to Personnel Files
7. Performance Evaluations
8. Hours of Work
9. Compensation
10. Benefits
11. Code of Conduct
12. Discipline
13. Training



## **Record Keeping**

### **Policy and Procedure**

This policy and procedure is compliant with 935 CMR 500.000 (“the Regulations”)

#### **I. Intent**

J-B.A.M. is committed to being compliant with the regulations and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”).

To provide clear and concise instructions for J-B.A.M. employees regarding Record Keeping that are in compliance with the Regulations

#### **II. Purpose**

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that our Record Keeping Procedures are compliant will all regulations and laws.

#### **III. Access to the Commission**

J-B.A.M. electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of the Regulations are subject to inspection.

#### **IV. Types of Records (Adult Use)**

The following records will be maintained and stored by J-B.A.M. and available to the Commission upon request:

1. Operating procedures as required by 935 CMR 500.105(1)
  - a. Security measures in compliance with 935 CMR 500.110;
  - b. Employee security policies, including personal safety and crime prevention techniques;
  - c. A description of the Marijuana Establishment’s hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.

- d. Storage of marijuana in compliance with 935 CMR 500.105(11);
- e. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
- f. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- g. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- h. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- i. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- j. Alcohol, smoke, and drug-free workplace policies;
- k. A plan describing how confidential information will be maintained;
- l. A policy for the immediate dismissal of any marijuana establishment agent who has:
  - i. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  - ii. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - iii. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- m. A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
- n. Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- o. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- p. Policies and procedures for energy efficiency and conservation that shall include:
  - i. Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
  - ii. 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;

- iii. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- iv. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

2. Operating procedures as required by 935 CMR 500.130(5)

- a. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
- b. Policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety;
- c. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products is segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);
- d. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
- e. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and
- f. Policies and procedures for the transfer, acquisition, or sale of marijuana products
- g. between Marijuana Establishments.

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

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

5. Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;

- a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- b. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
  - i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);

- ii. Documentation of verification of references;
    - iii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - iv. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    - v. Documentation of periodic performance evaluations;
    - vi. A record of any disciplinary action taken; and
    - vii. Notice of completed responsible vendor and eight-hour related duty training.
  - c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  - d. Personnel policies and procedures; and
  - e. All background check reports obtained in accordance with 935 CMR 500.030
6. Business records, which shall include manual or computerized records of:
  - a. Assets and liabilities;
  - b. Monetary transactions;
  - c. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
  - d. Sales records including the quantity, form, and cost of marijuana products; and
  - e. Salary and wages paid to each employee, stipend paid to each board member, and an 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.
7. Waste disposal records as required under 935 CMR 500.105(12); and
8. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
9. Responsible vendor training program compliance records.
10. Vehicle registration, inspection and insurance records.

All records kept and maintained by J-B.A.M. will be securely held. Access to these records will only be accessible to those J-B.A.M. Agents who require access as a part of their job duties.

### **Incident Reporting**

J-B.A.M. will immediately notify appropriate law enforcement authorities and the Commission within 24 hours after discovering any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, personal caregivers, or ME agents.





## **Maintaining Financial Records Policy and Procedure**

### **I. Intent**

J-B.A.M is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”) or any other regulatory agency.

To provide clear and concise instructions for J-B.A.M employees regarding the Maintenance of Financial Records that are in compliance with the Regulations

### **II. Purpose**

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that our financial records are maintained in a compliant manner in compliance with all regulations and laws.

### **III. Policy**

All J-B.A.M financial records will be kept and maintained according to generally accepted accounting principles. Our CFO is responsible for all accounting responsibilities and will engage the services of external Accountants and Tax Professionals to ensure proper accounting compliance. We will also hire or engage as a contractor a bookkeeper with experience in business accounting to assist in the maintaining of these records.

1. All J-B.A.M financial/business records will be available for inspection to the Commission upon request.
2. J-B.A.M will maintain all business records in Manual and electronic (computerized) form. These records include, but are not limited to;
  - a. Assets and liabilities;
  - b. Monetary transactions;

- c. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- d. Sales records including the quantity, form, and cost of marijuana products; and
- e. Salary and wages paid to each employee, 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.

In relation to the maintenance of financial records J-B.A.M will incorporate the following into our business operations;

1. J-B.A.M will keep duplicate backup files of all payroll and human resources materials to assist in Human resources management and payroll services for our employees and ensure continuity
2. J-B.A.M has and will maintain a banking relationship with Northern Bank to provide banking services for our company.
3. J-B.A.M will use up to date financial software programs for all financial transactions.
4. J-B.A.M does not plan to make cash transactions with other Marijuana Establishments. All transactions will be done through traditional banking transactions including checks, wire transfers or credit cards.
5. On an annual basis J-B.A.M will engage the services of an independent certified public accountant who is preferably experienced in the legal marijuana industry, to conduct a financial audit of J-B.A.M finances (books).
6. J-B.A.M will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.
7. At the end of each business day a reconciliation audit will be done on each inventory recording station by the Facility Manager or designee.
8. Comprehensive financial audits will be done at the end of every day by the CFO or designee. At the discretion of the CFO the frequency of these audits may be changed to weekly and then monthly
9. At a minimum, a comprehensive audit by the CFO or designee of all sales transactions will be completed every month.
10. For the first year of operation the CFO will conduct a comprehensive audit of all of the facility's financial records every 3 months and report their findings to the CEO and COO.

### **Access to the Commission**

J-B.A.M electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with

generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

### **Access to the Massachusetts Department of Revenue ("DOR")**

J-B.A.M books, records, papers and other data will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the Commission of the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

Additionally, J-B.A.M will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

### **Point of Sale (POS) Systems**

J-B.A.M will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue ("DOR") Directive 16-1 "*Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems*". The POS System will be approved by the Commission

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected, if applicable. Along with the data in the POS system, J-B.A.M will maintain the following records:
  - a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
  - b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
  - c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
  - d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
  - e. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.

2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
  - a. individual item(s) sold,
  - b. selling price,
  - c. tax due, if any,
  - d. invoice number,
  - e. date of sale,
  - f. method of payment, and
  - g. POS terminal number and POS transaction number.
3. J-B.A.M will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
  - a. Internal sequential transaction numbers;
  - b. Records of all POS terminal activity; and
  - c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
  - d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
  - e. Any and all activity related to other operating modes available in the system, such as a training mode; and
  - f. Any and all changes in the setup of the system.
4. J-B.A.M will comply with the provisions of 935 CMR 500.140(6): Recording Sales.
  - a. J-B.A.M will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.
  - b. J-B.A.M may utilize a sales recording module approved by the DOR.
  - c. J-B.A.M will not utilize software or other methods to manipulate or alter sales data.
  - d. J-B.A.M will conduct a monthly analysis of our equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. J-B.A.M will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If J-B.A.M determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
    - i. We will immediately disclose the information to the Commission;

- ii. We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
  - iii. We will take such other action directed by the Commission to comply with 935 CMR 500.105.
- e. J-B.A.M will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- f. J-B.A.M will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- g. J-B.A.M will allow the Commission and the DOR may audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000





## Qualifications and Training Policy and Procedure

### I. Intent

J-B.A.M., Inc. is committed to being compliant with all regulations and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”) or any other regulatory agency.

This policy has been created to provide clear and concise instructions for J-B.A.M., Inc. employees regarding the qualifications for employment and agent training that are in compliance with the Regulations.

### II. Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that we only hire qualified Marijuana Establishment Agents and that our training process and curriculum are in compliance with all regulations and laws.

### III. Qualifications for J-B.A.M., Inc. Agents

The minimum requirements to become a J-B.A.M., Inc. Marijuana Establishment Agent (“J-B.A.M., Inc. Agent”) are outlined below. J-B.A.M., Inc. board members, directors, employees, executives, managers or volunteers will register with the Commission as a J-B.A.M., Inc. Marijuana Establishment Agent. For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

J-B.A.M., Inc., Agents must;

1. Be 21 years of age or older;
2. Have not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and
3. Be determined suitable for registration consistent with the provisions of 935CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.

J-B.A.M., Inc., will develop a job description for all positions with the company. While all J-B.A.M., Inc., Agents must meet the qualifications listed above, many of our positions will require additional qualifications depending on the required duties.

### **III. Required Training for J-B.A.M., Inc. Agents**

Pursuant 935 CMR 500.105(2)(a) and (b), J-B.A.M., Inc., will ensure all J-B.A.M., Inc., Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

1. As a CMO, J-B.A.M., Inc., will train all agents who are both an ME agent and a marijuana establishment in 935 CMR 500.105(2)(a) and (b); ME Agent Training, including training regarding privacy and confidentiality requirements for Agents. Agents responsible for tracking and entering product into the Biotrack THC Seed-to-Sale SOR must receive training in a form and manner determined by the Commission.
2. Our initial training begins during employee orientation where all new employees will be issued their employee handbook. Classroom or online training on this day will include, but not be limited to;
  - a. Code of Conduct;
  - b. Marijuana Regulations;
  - c. Security and Safety;
  - d. Emergency Procedures/Disaster Plan;
  - e. Diversion of Marijuana;
  - f. Terminatable Offences;
  - g. Confidential Information;
  - h. Employee Policies (all employee policies from the handbook will be covered) including but not limited to;
    - i. Alcohol, smoke and drug-free workplace;
    - ii. Equal Employment Policy;
    - iii. Anti-Harassment and Sexual Harassment Policy;
    - iv. Americans with Disability Act;
    - v. Employee Assistance Policy; and
    - vi. Diversity Plan
3. After the initial training is complete agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online or computerized or by means of on the job training (“OJT”).
4. All J-B.A.M., Inc., Agents will receive a minimum of 8 hours of training annually.

5. J-B.A.M., Inc., will record, maintain and store 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. These records will be stored in the Agents Training File. Training records will be retained by J-B.A.M., Inc., for at least seven year after agents' termination.
6. J-B.A.M., Inc., will require all of its Agents, Owners and Managers to attend and complete a Responsible Vendor Training Program to become designated as a "responsible vendor".
  - a. After the responsible vendor designation is applied each J-B.A.M., Inc., owner, manager, and Agent involved in the handling and sale of marijuana for adult use will successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."
  - b. Although administrative employees who do not handle or sell marijuana are not required to take the responsible vendor program, J-B.A.M., Inc., will allow and encourage them to attend on a voluntary basis.
  - c. J-B.A.M., Inc., will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

## J-B.A.M. Energy Efficiency Plan

J-B.A.M. will satisfy the 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) and as a condition of renewal under 935 CMR 500.103(4).

J-B.A.M. is currently cultivating in this location in a site that has been approved for energy efficiency measures. The new manufacturing use is not expected to add any significant energy draw as it is focused on solventless extracts, rosin, keif, and infused flower/prerolls.

This shall include:

- 1) Identification of potential energy-use reduction opportunities (such as hybrid or electric vehicles, or high-efficiency vehicles), 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**); and
- (4) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

J-B.A.M. fully supports the need to recycle at our facility. J-B.A.M. will be compliant with 935 CMR: 500.105 (12), 501.105 (12) and 502.105 (12).

J-B.A.M. will provide recycling containers for glass, plastic, and aluminum and separate containers for paper/cardboard recycling. All employees are encouraged to rinse out their containers and place items in the proper receptacle. The receptacles will be emptied every week and the contents will be disposed of at a recycling facility.

All recyclables and waste, including organic waste will be stored, secured, and managed in accordance with City of Worcester applicable statutes, ordinances, and regulations. All recyclables and waste, including organic waste shall be stored, secured, and managed in accordance with the state of Massachusetts statutes, ordinances, and regulations.

Organic material, recyclable material and solid waste generated at our facility will be redirected or disposed of as follows:

Organic and recyclable material shall be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.

To the greatest extent feasible: Any recyclable material as defined in 310 CMR 16.02: Definitions shall be recycled in a manner approved by the Commission; and any Marijuana containing organic material as

defined in 310 CMR 16.02: Definitions shall be ground up and mixed with other organic material as defined in 310 CMR 16.02 at the MTC such that the resulting mixture renders any Marijuana unusable for its original purpose.

Once such Marijuana has been rendered unusable, the organic material may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.



## Safety Plan

### 1 WORKPLACE SAFETY PROGRAM

#### Introduction

J-B.A.M. is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”) or any other regulatory agency. This policy has been created to provide clear and concise instructions for all our employees to maintain Quality Control and Testing procedures that are in compliance with the Regulations.

This program is intended to serve as the basis for an integrated safety and health management program. The program consists of the following essential elements:

1. Management's commitment and involvement
2. Safety committee operation
3. Provisions for safety and health training
4. Safety Inspections
5. Preventive Maintenance
6. First aid procedures
7. Accident investigations
8. Recordkeeping of injuries
9. Job specific safety rules and procedures
10. Compliance with 105 CMR 590.000: State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments
11. HACCP

### 1.1 SAFETY COMMITTEE ORGANIZATION

A safety coordinator or a safety committee will be established to recommend improvements to our workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards. The safety committee consists of an “equal” representation of supervisory and nonsupervisory members of our organization.

Safety Program Coordinator _____	Nonsupervisory Employee Member _____
Supervisory Employee Member _____	Nonsupervisory Employee Member _____
Supervisory Employee Member _____	Nonsupervisory Employee Member _____

### 1.2 RESPONSIBILITIES

The safety committee shall determine the schedule for evaluating the effectiveness of control measures used to protect employees from safety and health hazards in the workplace.

The safety committee is responsible for assisting management in reviewing and updating workplace safety rules based on accident investigation findings, any inspection findings, and employee reports of unsafe conditions or work practices; and accepting and addressing anonymous complaints and suggestions from employees.

The safety committee is responsible for assisting management in updating the workplace safety program by evaluating employee injury and accident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The safety committee is responsible for assisting management in evaluating employee accident-and illness-prevention programs, and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety committee members will participate in safety training and is responsible for assisting management in monitoring workplace safety education and training to ensure that it is in place, that it is effective, and that it is documented.

### 1.3 MEETINGS

Safety committee meetings are held quarterly, or more often if needed. The safety program coordinator will post the minutes of each meeting within one week after each meeting.

**1.4 SAFETY COMMITTEE MEETING MINUTES**

Date of Committee Meeting: \_\_\_\_\_ Time: \_\_\_\_\_

Minutes Prepared by: \_\_\_\_\_ Location: \_\_\_\_\_

Names of Members in Attendance:


Previous Action Items: \_\_\_\_\_

Review of Accidents Since Previous Meeting: \_\_\_\_\_

Recommendations for Prevention: \_\_\_\_\_

Recommendations from Anonymous Employees: \_\_\_\_\_

Suggestions from Employees: \_\_\_\_\_

Recommended Updates to Safety Program: \_\_\_\_\_

Recommendations from Accident Investigation Reports: \_\_\_\_\_

Safety Training Recommendations: \_\_\_\_\_

Comments: \_\_\_\_\_



## SAFETY AND HEALTH TRAINING

### 1.5 SAFETY AND HEALTH ORIENTATION

Workplace safety and health orientation begins on the first day of initial employment or job transfer. Each employee has access to a copy of this safety manual, through his or her supervisor, for review and future reference, and each employee is given a personal copy of the safety rules, policies and procedures pertaining to his or her job. Supervisors will ask questions of employees and answer employees' questions to ensure knowledge and understanding of safety rules, policies and job-specific procedures described in our workplace safety program manual.

All employees will be instructed by their supervisors that compliance with the safety rules described in the workplace safety manual is required.

***All training will be documented and records are maintained.***

### 1.6 JOB-SPECIFIC TRAINING

- Supervisors will initially train employees on how to perform assigned job tasks safely.
- Supervisors will carefully review with each employee the specific safety rules, policies and procedures that are applicable and that are described in the workplace safety manual.
- Supervisors will give employees verbal instructions and specific directions on how to do the work safely.
- Supervisors will observe employees performing the work. If necessary, the supervisor will provide a demonstration using safe work practices or remedial instruction to correct training deficiencies before an employee is permitted to do the work without supervision.
- All employees will receive safe operating instructions on seldom-used or new equipment before using the equipment.
- Supervisors will review safe work practices with employees before permitting the performance of new, nonroutine or specialized procedures.

### 1.7 PERIODIC RETRAINING OF EMPLOYEES

All employees are retrained periodically on safety rules, policies and procedures, and when changes are made to the workplace safety manual.

Individual employees are retrained after the occurrence of a work-related injury caused by an unsafe act or work practice, and when a supervisor observes employees displaying unsafe acts, practices or behaviors.

**1.8 SAFETY TRAINING DOCUMENTATION**

EMPLOYEE:

DATE:

SUPERVISOR:

TRAINER:

RULES AND REGULATIONS REVIEWED

DATE: \_\_\_\_\_

General Review Of Old/New (Circle One) Safety Rules For All Employees

Specific Safety Procedures for Employees Position

General Maintenance

First Aid

Lifting Procedures

Office Safety

Furniture Use

Equipment Use

Climbing a Step Ladder

Sanitation / Health

All categories have been reviewed with employee.

Supervisor Name, Printed:

Signature: \_\_\_\_\_

I have been advised of all Safety and Health regulations and will adhere to them to the best of my ability.

Employee Name, Printed:

Signature: \_\_\_\_\_

---

## 2 SAFETY INSPECTIONS

It is up to all employees to maintain safe working conditions.

Checklists for safety inspections ensure that important items are not overlooked. Inspections identify areas of risk. (accident and/or injury)

Safety Directors/Supervisors will continually monitor work areas, but scheduled inspections should be documented and done on a regular basis. Written reports of these inspections should be made and kept on file.

Management will make periodic inspections, announced and unannounced.

Doors	Personnel Training
Windows	Stairs
Walking – Working Surfaces	Personal Protective Equipment
Lighting	Flammable & Combustible Materials
Fire Hazards	Hand and Portable Powered Tools
Electrical Boxes	Lockout/Tagout Procedures
Flammable Liquids	Confined Spaces
Emergency Exits:	Hazard Communication
Marked Properly	Electrical
Unobstructed	Building and Grounds Conditions
First Aid Kits, Supplies	Housekeeping Program
Fire Extinguishers	Heating and Ventilation
Accessible	Required OSHA Recordkeeping
Charged	Safety & Health Programs
Required Posters	Your Specific Work Environment

### **3 PREVENTIVE MAINTENANCE**

Preventive maintenance programs will avoid most equipment failures. Provide regular equipment maintenance to prevent breakdowns that can create hazards.

Preventive maintenance is a schedule of planned inspections to prevent breakdowns and failures before they happen. Inspections should be performed at regularly scheduled times.

Preventive and regular maintenance should be documented and tracked to completion.

During preventive maintenance, workers can document damage or wearing of parts or equipment so as to repair or replace parts *before* they cause a failure or injuries.

Without a preventive maintenance program, you will lose productivity, and costs will escalate.

### **4 FIRST-AID PROCEDURES**

#### **Emergency Phone Numbers**

Safety Coordinator: \_\_\_\_\_

Poison Control: \_\_\_\_\_

First Aid Response: \_\_\_\_\_

Fire Department: \_\_\_\_\_

Ambulance: \_\_\_\_\_

Police: \_\_\_\_\_

Medical Clinic: \_\_\_\_\_

Clinic Name/Address: \_\_\_\_\_

#### **4.1 MINOR FIRST-AID TREATMENT**

First-aid kits are kept in the front office and in the service vehicles. If you sustain an injury or are involved in an accident requiring minor first-aid treatment:

- Inform your supervisor.
- Administer first-aid treatment to the injury or wound.
- If a first-aid kit is used, indicate usage on the accident investigation report.
- Access to a first-aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the accident investigation report.

#### **4.2 NONEMERGENCY MEDICAL TREATMENT**

For nonemergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the accident investigation report.

### 4.3 EMERGENCY MEDICAL TREATMENT

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance from a co-worker.
- Use the emergency telephone numbers and instructions posted on the first-aid kit to request assistance and transportation to the local hospital emergency room.
- Provide details for the completion of the accident investigation report.

### 4.4 FIRST-AID TRAINING

Each employee will receive training and instructions from his or her supervisor regarding our first-aid procedures.

### 4.5 FIRST-AID INSTRUCTIONS

**In all cases requiring emergency medical treatment, immediately call or have a co-worker call to request emergency medical assistance. Use required bloodborne pathogen procedures while administering first aid.**

#### **Wounds:**

*Minor: Cuts, lacerations, abrasions or punctures*

- Wash the wound using soap and water; rinse it well.
- Cover the wound using a clean dressing.

*Major: Large, deep and bleeding wounds*

- Stop the bleeding by pressing directly on the wound, using a bandage or cloth.
- Keep pressure on the wound until medical help arrives.

#### **Broken Bones:**

- Do not move the victim unless it is absolutely necessary.
- If the victim must be moved, "splint" the injured area. Use a board, cardboard or rolled newspaper as a splint.

#### **Burns:**

Thermal (Heat)

- Rinse the burned area without scrubbing it, and immerse it in cold water.  
*Do not use ice water.*
- Blot dry the area and cover it using sterile gauze or a clean cloth.

Chemical

- Immediately flush the exposed area with cool water for 15 to 20 minutes.

#### **Eye Injury:**

Small particles

- Do not rub your eyes.
- Use the corner of a soft clean cloth to draw particles out, or hold the eyelids open and flush the eyes

continuously with water.

Large or stuck particles

- If a particle is stuck in the eye, do not attempt to remove it.
- Cover both eyes with a bandage.

Chemical

- Immediately irrigate the eyes and under the eyelids with water for 30 minutes.

#### **Neck or Spine Injury:**

- If the victim appears to have injured his or her neck or spine, or is unable to move his or her arm or leg, do not attempt to move the victim unless it is absolutely necessary.

#### **Heat Exhaustion:**

- Loosen the victim's tight clothing.
- Give the victim *sips* of cool water.
- Make the victim lie down in a cooler place with the feet raised.

## **5 ACCIDENT INVESTIGATION**

### **5.1 ACCIDENT INVESTIGATION PROCEDURES**

An accident investigation will be performed by the supervisor at the location where the accident occurred. The safety coordinator is responsible for seeing that the accident investigation reports are being filled out completely and that the recommendations are being addressed. Supervisors will investigate all accidents, injuries and occupational diseases using the following investigation procedures:

- Implement temporary control measures to prevent any further injuries to employees.
- Review the equipment, operations and processes to gain an understanding of the accident situation.
- Identify and interview each witness and any other person who might provide clues to the accident's causes.
- Investigate causal conditions and unsafe acts; make conclusions based on existing facts.
- Complete the accident investigation report.
- Provide recommendations for corrective actions.
- Indicate the need for additional or remedial safety training.

Accident investigation reports must be submitted to the safety coordinator within 24 hours of the accident.

#### **OSHA requires employers to report any/all of the following within 8 hours of the incident:**

- Fatalities
- A single incident which requires hospitalization of 3 or more employees

**OSHA CENTRAL TELEPHONE NUMBER: 1-800-321-6742**

## 5.2 ACCIDENT INVESTIGATION REPORT

Report No.: \_\_\_\_\_

Company: \_\_\_\_\_

Address: \_\_\_\_\_

1. Name of injured: \_\_\_\_\_ S.S. No.: \_\_\_\_\_

2. Sex:  M  F Age: \_\_\_\_\_ Date of accident: \_\_\_\_\_

3. Time of accident: \_\_\_\_\_ a.m. \_\_\_\_\_ p.m. Day of accident: \_\_\_\_\_

4. Employee's job title: \_\_\_\_\_

5. Length of experience on job: \_\_\_\_\_ years: \_\_\_\_\_ months

6. Address of location where the accident occurred: \_\_\_\_\_

7. Nature of injury, injury type, and part of the body affected: \_\_\_\_\_

8. Describe the accident and how it occurred: \_\_\_\_\_

9. Cause of the accident: \_\_\_\_\_

10. Was personal protective equipment required?  yes  no

Was it provided?  yes  no

Was it being used?  yes  no

If "no," explain: \_\_\_\_\_

Was it being used as trained by supervisor or designated trainer?  yes  no

If "no," explain: \_\_\_\_\_

11. Witness(es): \_\_\_\_\_

12. Was safety training provided to the injured?  yes  no

If "no," explain: \_\_\_\_\_

13. Interim corrective actions taken to prevent recurrence: \_\_\_\_\_

14. Permanent corrective action recommended to prevent recurrence: \_\_\_\_\_

15. Date of report: \_\_\_\_\_ , \_\_\_\_\_ 20\_\_\_\_

Prepared by: \_\_\_\_\_

Supervisor (**Signature**): \_\_\_\_\_ Date: \_\_\_\_\_

16. Status and follow-up action taken by safety coordinator: \_\_\_\_\_

Safety Coordinator (**Signature**) \_\_\_\_\_ Date \_\_\_\_\_

### 5.3 INSTRUCTIONS FOR COMPLETING THE ACCIDENT INVESTIGATION REPORT

An accident investigation is not designed to find fault or place blame, but it is an analysis of the accident to determine causes that can be controlled or eliminated.

**(Items 1-6) Identification:** This section is self-explanatory.

**(Item 7) Nature of Injury:** Describe the injury, e.g., strain, sprain, cut, burn, fracture.

**Injury Type:** First aid—injury resulted in minor injury/treated on premises; Medical—injury treated off premises by physician; Lost time—injured missed more than one day of work; No Injury—no injury, near-miss type of incident.

**Part of the Body:** Part of the body directly affected, e.g., foot, arm, hand, head.

**(Item 8) Describe the accident:** Describe the accident, including exactly what happened, and where and how it happened. Describe the equipment or materials involved.

**(Item 9) Cause of the accident:** Describe all conditions or acts which contributed to the accident, e.g.—

- a. unsafe conditions (spills, grease on the floor, poor housekeeping or other physical conditions).
- b. unsafe acts (unsafe work practices such as failure to warn, failure to use required personal protective equipment).

**(Item 10) Personal protective equipment:** This section is self-explanatory.

**(Item 11) Witness(es):** List name(s), address(es), and phone number(s).

**(Item 12) Safety training provided:** Was any safety training provided to the injured relating to the work activity being performed?

**(Item 13) Interim corrective action:** Measures taken by supervisor to prevent recurrence of incident, e.g., barricading accident area, posting warning signs, shutting down operations.

**(Item 14):** This section is self-explanatory.

**(Item 15):** This section is self-explanatory.

**(Item 16) Follow-up:** Once the investigation is complete, the safety coordinator shall review and follow up the investigation to ensure that corrective actions recommended by the safety committee and approved by the employer are taken and that control measures have been implemented.

## 6 RECORDKEEPING PROCEDURES

The safety coordinator will control and maintain all employee accident and injury records. Records are maintained for a minimum of five (5) years and include:

- Accident Investigation Reports, see Section 7, page 17
- Workers' Compensation First Report of Injury or Illness
- Log and Summary of Occupational Injuries and Illnesses as required by OSHA's Recordkeeping Regulation, 29 CFR 1904.2:
  - OSHA Form 300 (Rev. 1-2004): Log of Work Related Injuries and Illnesses
  - OSHA Form 300A (Rev. 1-2004): Summary of Work Related Injuries and Illnesses



- OSHA Form 301: Injury and Illness Incident Report

For certain business classes, Federal OSHA provides for an exemption from accident record keeping requirements. For a current list of business classes that may be exempt from this requirement, please visit the following website: [www.osha.gov](http://www.osha.gov). Go to the "Recordkeeping" link, and then the "Partially Exempt Industries" link in the middle of the page.

## **7 SAFETY RULES, POLICIES AND PROCEDURES**

The safety rules contained on these pages have been prepared to protect you in your daily work. Employees are to follow these rules, review them often and use good common sense in carrying out assigned duties.

These safety rules shall include both general workplace safety rules and job-specific safety rules.

### **General Rules:**

All Employees

### **Job-Specific Rules:**

By Occupational Class, e.g., painter, clerk, carpenter, etc.

#### **7.1 ALL EMPLOYEES**

##### **7.1.1 HOUSEKEEPING**

1. Use caution signs/cones to barricade slippery areas.
2. Do not store or leave items on stairways.
3. Return tools to their storage places after using them.
4. Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment such as fire extinguishers or fire alarms.
5. Do not place materials such as boxes or trash in walkways and passageways.
6. Do not use gasoline for cleaning purposes.
7. Mop up water around water fountains, drink machines and ice machines.

##### **7.1.2 LIFTING PROCEDURES**

General

1. Test the weight of the load before lifting by pushing the load along its resting surface.
2. If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a co-worker.
3. Never lift anything if your hands are greasy or wet.
4. Wear protective gloves when lifting objects with sharp corners or jagged edges.

##### **7.1.3 WHEN LIFTING—**

1. Face the load.
2. Position your feet 6"-12" apart with one foot slightly in front of the other.
3. Bend at the knees, not at the back.
4. Keep your back straight.

5. Get a firm grip on the object using your hands and fingers. Use handles when they are present.
6. Hold the object as close to your body as possible.
7. Perform lifting movements smoothly and gradually; do not jerk the load.
8. If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body. Do not twist at the waist.
9. Set down objects in the same manner as you picked them up, except in reverse.
10. Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.

## **7.2 ALL EMPLOYEES**

### **7.2.1 LADDERS AND STEPLADDERS**

1. Read and follow the manufacturer's instruction label affixed to the ladder if you are unsure how to use the ladder.
2. Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads, or other visible damage.
3. Keep ladder rungs clean and free of grease. Remove buildup of material such as dirt or mud.
4. When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder.
5. Allow only one person on the ladder at a time.
6. Do not stand on the top two rungs of any ladder.
7. Do not stand on a ladder that wobbles or leans to the left or right of center or is crooked.
8. Do not try to "walk" a ladder by rocking it. Climb down the ladder and then move it.

### **7.2.2 CLIMBING A LADDER**

1. Face the ladder when climbing up or down it.
2. Do not carry items in your hands while climbing up or down a ladder.
3. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down the ladder.

### **7.2.3 DRIVING/VEHICLE SAFETY**

#### Fueling Vehicles

1. Turn the vehicle off before fueling.
2. Do not smoke while fueling a vehicle.
3. Wash hands with soap and water if you spill gasoline on them.

#### Driving Rules

1. Shut all doors and fasten your seat belt before moving the vehicle.

2. Obey traffic patterns and signs at all times.
3. Maintain a three-point contact using both hands and one foot or both feet and one hand when climbing into and out of vehicles.
4. Do not leave keys in an unattended vehicle.

### **7.3 OFFICE PERSONNEL**

#### **7.3.1 OFFICE SAFETY**

##### General

1. Do not place material such as boxes or trash in walkways and passageways.
2. Do not throw matches, cigarettes or other smoking materials into trash baskets.
3. Do not kick objects out of your pathway; pick them up or push them out of the way.
4. Keep floors clear of items such as paper clips, pencils, tacks or staples.
5. Straighten or remove rugs and mats that do not lie flat on the floor.
6. Mop up water around water fountains and drink machines.
7. Do not block your view by carrying large or bulky items; use a dolly or hand truck or get assistance from a fellow employee.
8. Store sharp objects, such as pens, pencils, letter openers or scissors, in drawers or with the points down in a container.
9. Carry pencils, scissors and other sharp objects with the tips pointing down.
10. Use the ladder or step stool to retrieve or store items that are located above your head.
11. Do not run on stairs or take more than one step at a time.
12. Keep doors in hallways fully open or fully closed.
13. Use handrails when ascending or descending stairs or ramps.
14. Obey all posted safety and danger signs.

#### **7.3.2 FURNITURE USE**

1. Open only one file cabinet drawer at a time. Close the filing cabinet drawer you were working in before opening another filing drawer in the same cabinet.
2. Use the handle when closing doors, drawers and files.
3. Put heavy files in the bottom drawers of file cabinets.
4. Do not tilt your chair on its back two legs while you are sitting in it.
5. Do not stand on furniture to reach high places.

#### **7.3.3 EQUIPMENT USE**

1. Do not use fans that have excessive vibration, frayed cords or missing guards.
2. Do not place floor-type fans in walkways, aisles or doorways.
3. Do not plug multiple electrical cords into a single outlet.

4. Do not use extension or power cords that have the ground prong removed or broken off.
5. Do not use frayed, cut or cracked electrical cords.
6. Use a cord cover or tape down cords when running them across aisles, between desks or across entrances or exits.
7. Turn the power switch of the local exhaust fans to "ON" when operating the blueprint machine.
8. Do not use lighting fluid to clean drafting equipment; use soap and water.

## **8 QUALITY CONTROL – SANITATION STANDRD OPERATING PROCEDURE**

### **8.1.1 FACILITY**

J-B.A.M.'s facility ("the facility") is designed and constructed with safe food handling and sanitation in mind. All equipment in the facility will comply with 105 CMR 590.000: *State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments* and the design and construction standards of appropriate nationally recognized standards and/or code requirements and bear the certification mark of an ANSI accredited organization (e.g. NSF, UL, ETL).

1. All product contact surfaces are smooth, durable and easily cleanable. The walls, ceiling and floors of all cultivation, processing and storage areas are constructed of materials that are smooth, durable and can be adequately kept clean and in good repair. There must be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the production of safe marijuana.
3. Floor drains and floors are effectively sloped and designed prevent pooling water. Drains have proper grating to prevent blockage and stopping of drains.
4. Overhead fixtures, ducts and pipes are designed as to prevent drips or condensate from potential contamination of marijuana products or marijuana products-packaging materials. Piping and conduit is at least 25 mm (2.5 cm) from the walls and ceilings.
5. Aisles or working spaces are provided between equipment and walls and are adequately unobstructed and of adequate width to permit employees to perform their duties and to protect against contaminating infused or marijuana products or infused or marijuana products- contact surfaces with clothing or personal contact.
6. Lighting and light fittings are shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over cultivation, processing or storage areas or otherwise protect against marijuana product contamination in case of glass breakage. Suspended lighting is constructed from non- corrodible and cleanable assemblies. Adequate lighting is installed in hand-washing areas, dressing and locker rooms, and toilet rooms and in all areas where infused or marijuana products are examined, processed, or stored and where equipment or utensils are cleaned. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers. J-B.A.M. will ensure adequate safety lighting in all

production, processing and storage areas, as well as areas where equipment or utensils are cleaned.

7. Buildings, fixtures, and other physical facilities are constructed in such a manner that allow them to be maintained in a sanitary condition.
8. Adequate ventilation or control equipment is installed to minimize odors and vapors (including steam and noxious fumes) in areas where they may contaminate marijuana products. Fans and other air-blowing equipment shall be operated in a manner that minimizes the potential for contaminating infused or marijuana products, infused or marijuana products-packaging materials, and infused or marijuana products-contact surfaces.
9. Handwashing facilities are adequate and convenient and shall be furnished with running water at a suitable temperature. Handwashing sinks are located in all production and processing areas and where good sanitary practices require employees to wash and sanitize their hands. J-B.A.M. will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
10. The facility water supply comes from the City of Pittsfield municipal water supply and is sufficient for necessary operations. The facilities plumbing is of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There is no cross-connections between the potable and wastewater lines. The facility will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.
11. All storage areas are constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

#### **8.1.2 CONTAMINATION CONTROL**

1. All entrance and exit doors to the facility are self-closing and rodent proof. Air curtains will prevent insects and microbial contaminants from entering the building when doors are in use. Insect screening, HEPA, and carbon filters will prevent pest and microbial contaminants from entering through vents and exhaust from the outside. Foot baths and sticky mats are strategically placed thru out the facility to collect pest and contaminants from foot ware.
2. Employee and visitor gowning is required. Employees are required to change out of their street clothes and footwear into uniforms and footwear dedicated to the facility. Visitors are required to secure personal belongings and don jump suits and disposable boot covers.
3. Training: All employees are trained on pest prevention, pest management, pest detection, and pest treatments.
4. Traps for monitoring: Small sticky traps for monitoring of flying or airborne pest shall be posted, mapped and levels of any pest monitored/documented.
5. Handling and storage of marijuana product or marijuana plant waste: All marijuana plant waste is placed in the "Marijuana Waste" container located in each cultivation and processing area. This container must be impervious and covered at all times. At the end of every day, the "Marijuana

Waste” container must be emptied, and the contents transferred to the Marijuana Waste Room. All plant waste is stored in the waste room in sealed containers until disposal.

6. All non-marijuana waste is placed into the appropriate impervious covered waste receptacles; Recyclable, Organic and Solid Waste. At the end of every day these containers are emptied, and the contents removed from the building and placed in the appropriate containers to await pickup.
7. All toxic materials including cleaning compounds, pesticides, sanitizers, etc. is stored in an area away from production, processing and storage areas.

### **8.1.3 SANITATION**

All marijuana products are prepared, handled, and stored in compliance with;

- The sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*;
- The sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments*; and
- The requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*

1. Storage- Separate storage rooms are utilized for finished marijuana products.
2. Hand Washing- The facility will have a separate handwashing sink; hand drying device, or disposable towels; supply of hand cleaning agent; and waste receptacle for each processing, production, utensil washing area, and toilet room.
  - a. Sinks used for product preparation or for washing equipment or utensils shall not be used for handwashing.
  - b. Each handwashing sink is provided with hot and cold water tempered by means of a mixing valve or a combination faucet to provide water at a temperature of at least 110 degrees Fahrenheit.
  - c. Handwashing sinks are of sufficient number and conveniently located for use by all employees in the production, processing and utensil washing areas. Handwashing sinks are easily accessible and may not be used for purposes other than handwashing.
3. Toilet Room- A toilet room shall be available for use by all workers. Ventilation is provided by mechanical means. A soap dispenser and disposable towels shall be provided for hand washing in toilet rooms.
4. Manual Cleaning and Sanitizing- For manual cleaning and sanitizing of equipment and utensils, a stainless steel three-compartment sink will be used.
  - a. The sink compartments shall be large enough to hold the largest pot, pan or piece of equipment.
  - b. Each compartment is supplied with adequate hot and cold potable running water.
  - c. Integral drainboards of adequate size shall be provided on both sides of the sink for cleaned and soiled utensils.
  - d. A floor drain is located in the immediate vicinity of the sink in areas where wet pots, utensils and equipment are air-drying.

- e. Stainless Steel racks, shelves or dish tables are to be provided adjacent to the warewash sink.
- f. An approved chemical test kit for determining sanitizer strength will be available and used.
- g. Manual Warewashing Procedure
  - i. Rinse, scrape, or soak all items before washing.
  - ii. Record the date, sanitizer water temperature or test strip results, and initial record on Manual Warewashing Monitoring Form.
  - iii. Wash items in the first sink in a detergent solution. Water temperature should be at least 110°F. Use a brush, cloth, or scrubber to loosen remaining soil. Replace detergent solution when suds are gone or water is dirty.
  - iv. Immerse or spray-rinse items in second sink. Water temperature should be at least 110°F. Remove all traces of food and detergent. If using immersion method, replace water when it becomes cloudy, dirty, or sudsy.
  - v. Immerse items in third sink filled with hot water or a chemical-sanitizing solution.
    - 1. If hot water immersion is used, the water temperature must be at least 180°F. Items must be immersed for 30 seconds. Proper personal protective equipment should be worn.
    - 2. If chemical sanitizing is used, the sanitizer must be mixed at the proper concentration. (Check at regular intervals with a test kit.) Water must be correct temperature for the sanitizer used.
      - a. The strength of the sanitizer must be measured in accordance with manufacturer's instructions.
  - vi. To avoid recontamination of clean and sanitary items:
    - 1. Air dry all items on a drainboard.
    - 2. Wash hands prior to returning to storage.

**8.1.4 WAREWASHING SINK SETUP**

WASH	RINSE	SANITIZE
110°F	110°F	180°F or
Soapy Water	Clear Water	Chemical Sanitizer

Chemical Solution	Concentration Level	Minimum Temperature	Minimum Immersion Time
Chlorine Solution	25mg/l minimum	120°F	10 seconds
	50mg/l minimum	100°F	10 seconds
	100mg/l minimum	55°F	10 seconds

Iodine Solution	12.5-25.0mg/l	75°F	30 seconds
Quaternary Ammonium Solution	200 ppm maximum	75°F	30 seconds

h. Equipment Cleaning and Sanitizing Procedure

- i. Disassemble removable parts from equipment.
- ii. Use the three-sink method to wash, rinse, and sanitize all parts. Verify sanitizer concentration for each meal period and as necessary per policy.
  1. Quaternary ammonia –200 ppm and immerse for 30 seconds
  2. Iodine –12.5-25.0 ppm and immerse for 30 seconds
  3. Chlorine –50-99ppm and immerse for 7 seconds
- iii. Wash, rinse, and sanitize all food contact surfaces of the equipment that are stationary.
- iv. Allow all parts of the equipment to air dry.
- v. After being rinsed and sanitized, equipment and utensils should not be rinsed before air-drying, unless the rinse is applied directly from a ware washing Machine or the sanitizing solution calls for rinsing off the sanitizer after it has been applied in a commercial ware washing Machine.
- vi. Re-assemble the equipment.
- i. Product Preparation Surfaces- These surfaces are cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
  - i. Prescrape surface to remove gross soils.
  - ii. Wash surface with recommended strength solution of pot & pan detergent.
  - iii. Rinse with water and wipe dry.
  - iv. Using trigger sprayer bottle and a different wiping cloth, apply sanitizing solution of sanitizer.
    1. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds and allow to air dry.

**8.1.5 PERSONNEL**

1. Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of marijuana products, production or processing surfaces, or packaging materials becoming contaminated, shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.



- a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Board of Health.
  - b. J-B.A.M. will voluntarily comply with any and all isolation and/or quarantine orders issued by the Board of Health, the Department of Public Health or the Commission.
  - c. J-B.A.M. Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.
    - i. Agents may be re-assigned to activities so that there is no risk of transmitting a disease through food/product.
2. J-B.A.M. Agents shall conform to sanitary practices while on duty, including:
- a. Maintain adequate personal cleanliness:  
Grooming:
    - i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.
    - ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
      - a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
    - iii. Wash hands (including under fingernails) and up to forearms vigorously and thoroughly with soap and warm water for a period of 20 seconds:
      - When entering the facility before work begins.
      - Immediately before preparing or processing products or handling equipment.
      - As often as necessary during cultivation or product preparation when contamination occurs.
      - In the restroom after toilet use and when you return to your workstation.
      - When switching between working areas.
      - After touching face, nose, hair, or any other body part, and after sneezing or coughing.
      - After cleaning duties.
      - Between each task performed and before wearing disposable gloves.
      - After eating or drinking.
      - Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, picking up a dropped item, etc.
  - a. Wash hands only in hand sinks designated for that purpose.

- b. Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- i. Wear appropriate clothing – clean uniform with sleeves and clean non-skid close-toed work shoes (or leather tennis shoes) that are comfortable for standing and working on floors that can be slippery.
- ii. Wear sterile clothing on site, as appropriate.
  - Do not wear sterile clothing to and from work.
  - Change sterile clothing if it becomes soiled or stained.
- iii. Wear disposable gloves unless on break or performing work outside of production areas.
- iv. Wear gloves when handling products or product ingredients that will not be heated-treated.
- v. Wear gloves when packaging products.
- vi. Change disposable gloves as often as handwashing is required. Wash hands before donning and after discarding gloves.

Hair Restraints and Jewelry:

- i. Wear a hair net or bonnet in any production or processing area so that all hair is completely covered.
- ii. Keep beards and mustaches neat and trimmed. Beard restraints are required in any food/product production or processing area.
- iii. Refrain from wearing jewelry in the food/product production and processing area.
  - Only a plain wedding band.
  - No necklaces, bracelets, or dangling jewelry are permitted.
  - No earrings or piercings that can be removed are permitted.

Cuts, Abrasions, and Burns:

- i. Bandage any cut, abrasion, or burn that has broken the skin.
- ii. Cover bandages on hands with gloves and finger cots and change as appropriate.
- iii. Inform supervisor of all wounds.

Smoking, eating, and gum chewing:

- i. J-B.A.M. facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- ii. Eat and drink in designated areas only. A closed beverage container may be used in the production area if the container is handled to prevent contamination of 1)

the employee's hands, 2) the container, and 3) exposed product, clean equipment and utensils.

- iii. Refrain from chewing gum or eating candy during work in a food/product production or processing area.

## **9 HACCP- Hazard Analysis and Critical Control Point**

J-B.A.M. will implement a HACCP plan in accordance with *the HACCP Principles & Application Guidelines* issued by the FDA. This HACCP plan will address the processing, production and packaging of all marijuana products that J-B.A.M. will manufacture. Once operational J-B.A.M. will:

1. Assemble the HACCP team.
2. Describe the product and its distribution.
3. Describe the intended use and consumers of the product.
4. Develop a flow diagram which describes each process.
5. Verify the flow diagram.
6. Conduct a hazard analysis for each product (Principle 1).
7. Determine critical control points (CCPs) for each product (Principle 2).
8. Establish critical limits (Principle 3).
9. Establish monitoring procedures (Principle 4).
10. Establish corrective actions (Principle 5).
11. Establish verification procedures (Principle 6).
12. Establish record-keeping and documentation procedures (Principle 7).

## **10 Training**

J-B.A.M. will provide training and training opportunities to all of its employees. In addition to required training, J-B.A.M. will encourage advanced training to all employees in the areas of Plant Safety, Safe Cultivation Processes, Good Manufacturing Practices and HACCP.

1. All employees are trained on basic plant safety prior to or during the first day of employment.
  - a. Include basic product safety training as part of new employee orientation.
  - b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
  - c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
  - d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.
2. All employees engaging in the trimming or packaging are trained and certified in;
  - a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on plant safety, Good Manufacturing Practices and HACCP.

4. Monthly in-service training.
5. Require all managers to be Certified Food Protection Mangers (CFPM) by completing a SERVSAFE or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide plant safety and HACCP training.
7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance.
9. File documentation in HACCP records.

# **J-B.A.M. Diversity Plan**

J-B.A.M. aims to foster equitable opportunity for minorities, women, veterans, LGBTQ+ individuals, and people with disabilities and to promote principles of diversity management that will enhance the organization.

J-B.A.M.'s goal is to build a high-performing, diverse workforce based on mutual acceptance and trust.

The purpose of this policy is to ensure that J-B.A.M. is a diverse and inclusive company that promotes a bias free work environment and providing opportunities for J-B.A.M. employees who are minorities, women, veterans, LGBTQ+ individuals, and people with disabilities to use their diverse talents to support the company's mission.

J-B.A.M. will comply with the requirements of 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment

Any actions taken, or programs instituted, by J-B.A.M. will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

J-B.A.M. will implement this plan to ensure access to employment (including management positions) and other relationships with the company. The demographics which this plan promotes are outlined below:

## **Diversity Plan Populations ("Program Populations"):**

1. Minorities;
  2. Women;
  3. Veterans;
  4. People with disabilities; and
  5. People who are LBGTQ+
- 

## **Goals**

The goals that J-B.A.M. is committed to achieving though this plan and our vision include:

1. Make J-B.A.M. workplace a safe, accepting, respectful, welcoming, comfortable and supportive place to work.
  2. Include as our suppliers, contractors and wholesale partners businesses owned
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## **RECRUITMENT AND HIRING PROGRAM-**

**Goals-** Our goal for this program is to make J-B.A.M. workplace and management team as diverse as possible to include qualified employees with no regard to race, gender, age, disability, religion, sexual orientation, or any other non-merit factor. Our goal is to have the following workforce demographic:

- 50% female
- 30% minority, veteran, persons with a disability or persons who are LBGTQ+
  - Of this 30% our goal is to have 70% be minorities, 5-10% Veteran, 5-10% Persons with disabilities and 5-10% be persons who are LBGTQ+

**Program-** J-B.A.M. looks to recruit and hire diverse employees and plans to promote equity among minorities, veterans, people with disabilities and persons who are LBGTQ+ in the operation of our company. To promote diversity and equity J-B.A.M. will;

1. Give hiring preference to individuals who are identified in the Program Populations.
2. Institute a “blind hiring” policy in which the personal information of the candidate from the hiring manager that can lead to unconscious (or conscious) bias about the candidate.
3. Human Resource training for Hiring Managers that address unconscious bias and cultural sensitivity.
  - This training will be done upon hire and annually thereafter.
4. Promote our Diversity Hiring preferences on recruitment websites and on our social media presence.
5. Use job descriptions that are catered to and appeal to diverse candidates.
6. Engage with Industry trade groups, training companies and recruitment companies that promote diversity and inclusion. Engagement with these groups will include education for our hiring team, leads on candidates that fit our Program Populations and job posting that highlight our diversity hiring preference.
7. All job postings will be forwarded to the 1Berkshire and posted in the Berkshire Eagle. Both of these entities serve Pittsfield Massachusetts which has the highest minority populations in the area.
  - Our first Job postings will be withing 60 days of receipt of our Provisional License
  - Second and subsequent job posting will be done as needed.
8. J-B.A.M. will continue to participate in job fairs hosted by 1Berkshire and Pittsfield community organizations. We will also host a job fair within our neighborhood to provide opportunities to our neighbors.

**Measurements-** We will measure the success of the Recruitment and Hiring Program on an ongoing basis as we begin to hire to ensure that we are doing all we can to meet our goal. After 6 months of operation, and every 6 months thereafter, we will conduct a comprehensive evaluation of the Program and make necessary changes if needed. This comprehensive evaluation will include:

1. The number and percentage of employees who meet the criteria of the Program Populations that are outlined above;
2. The number and percentage of job applicants that meet the Program Population criteria;
3. The number of applicants that meet the Program Population criteria and if not hired, a description of the reason why; and
4. The number of job offers to applicants that meet the Program Population criteria and the reason (if known) what the applicant did not take the position

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**SUPPLIER/PARTNER PROGRAM-**

**Goals-** The goal of the Supplier/Partner Program is to provide equity in the industry by promoting access to the industry by suppliers, contractor and wholesale partners who meet the Program Populations outlined above. J-B.A.M. is committed to utilizing, and will give priority to the extent possible, to minority-owned, women owned, veteran owned, LGBTQ+ owned and business owned by persons with disabilities as suppliers, contractors and wholesale partners. J-B.A.M. recognizes that sourcing products and services from individuals and companies from these populations allows equitable access and revenues from legal cannabis. Our goal is to have at least 30% our suppliers, contractors and wholesale partners meet the criteria of the Program Populations that are outlined above.

**Program-** J-B.A.M. will actively identify and pursue partnerships with suppliers, contractors and Marijuana Establishments who meet the Program Populations that are outlined above.

1. J-B.A.M. will give preference to suppliers and contractors whose owners or employees meet the Program Populations outlined above.
2. We will actively recruit these individuals or companies and promote this Program when sourcing these services.
3. We will give priority to Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above when sourcing wholesale products.

**Measurement-** We will measure the success of the Supplier/Partner Program on an ongoing basis as we begin to contract individuals and companies for these services to ensure that we are doing all we can to meet our goal. After 6 months of operation, and every 6 months thereafter, we will conduct a comprehensive evaluation of the Program and make necessary changes if needed. This comprehensive evaluation will include:

1. The number and percentage of suppliers and contractors that we have engaged with that meet the criteria of the Program Populations that are outlined above;
2. The number and percentage of bids received from these individuals and companies that meet the Program Population criteria;
3. The number of individuals and companies that meet the Program Population criteria and if not contracted with, a description of the reason why;
4. The number and percentage of Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above, that we have contracted with as our wholesale partners; and
5. The number and percentage of Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above that we have engaged with that did not result in a wholesale agreement and the reasons why.

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**DIVERSITY PLAN EVALUATION**

In addition to evaluating the individual programs and goals outlined above, J-B.A.M. will perform an ongoing and comprehensive evaluation of this Diversity Plan as a whole to ensure that it promotes and provides equity to the Plan Populations. The progress or success of the plan must be documented upon renewal (one year from provisional licensure, and each year thereafter).

1. As we begin to recruit and hire potential employees the management team will evaluate the



applicant pool to ensure that our recruitment policies are generating a diverse representation;

2. Periodically, the management team will evaluate the workplace climate through observations, employee meetings and individual conversations with individual employees to ensure our workplace is a place of inclusion;
3. 60 days prior to our license renewal (from provisional license) and annually thereafter the J-B.A.M. management team will conduct a comprehensive evaluation of this plan that includes feedback from employees and stakeholders as to the effectiveness of its Programs and to see if the goals are attained; and
4. If, at any time, it is found that the plan is not reaching our goals, the executive management team will convene a special working group to evaluate the plan and make the necessary changes. This group may include outside consultants and professionals.

## **J-B.A.M. Diversity Plan 2.1**

J-B.A.M. aims to foster equitable opportunity for minorities, women, veterans, LGBTQ+ individuals, and people with disabilities and to promote principles of diversity management that will enhance the organization. J-B.A.M.'s goal is to build a high-performing, diverse workforce based on mutual acceptance and trust.

The purpose of this policy is to ensure that J-B.A.M. is a diverse and inclusive company that promotes a bias free work environment and providing opportunities for J-B.A.M. employees who are minorities, women, veterans, LGBTQ+ individuals, and people with disabilities to use their diverse talents to support the company's mission.

J-B.A.M. will comply with the requirements of 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment Any actions taken, or programs instituted, by J-B.A.M. will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws. J-B.A.M. will implement this plan to ensure access to employment (including management positions) and other relationships with the company.

The demographics which this plan promotes are outlined below: Diversity Plan Populations ("Program Populations"):

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

## **RECRUITMENT AND HIRING PROGRAM**

Goals- Our goal for this program is to make J-B.A.M. workplace and management team as diverse as possible to include qualified employees with no regard to race, gender, age, disability, religion, sexual orientation, or any other non-merit factor.

Our goal is to have the following workforce demographic:

- 50% female
- 30% minority, veteran, persons with a disability or persons who are LGBTQ+
  - Of this 30% our goal is to have 70% be minorities, 5-10% Veteran, 5-10% Persons with disabilities and 5-10% be persons who are LGBTQ+

**Program-** J-B.A.M. looks to recruit and hire diverse employees and plans to promote equity among minorities, veterans, people with disabilities and persons who are LGBTQ+ in the operation of our company.

To promote diversity and equity J-B.A.M. will;

1. Give hiring preference to individuals who are identified in the Program Populations.
2. Institute a “blind hiring” policy in which the personal information of the candidate from the hiring manager that can lead to unconscious (or conscious) bias about the candidate.
3. Human Resource training for Hiring Managers that address unconscious bias and cultural sensitivity.
  - This training will be done upon hire and annually thereafter.
4. Promote our Diversity Hiring preferences on recruitment websites and on our social media presence.
5. Use job descriptions that are catered to and appeal to diverse candidates.
6. Engage with Industry trade groups, training companies and recruitment companies that promote diversity and inclusion. Engagement with these groups will include education for our hiring team, leads on candidates that fit our Program Populations and job posting that highlight our diversity hiring preference.
7. All job postings will be forwarded to the 1Berkshire and posted in the Berkshire Eagle. Both of these entities serve Pittsfield Massachusetts which has the highest minority populations in the area.
  - Our first Job postings will be withing 60 days of receipt of our Provisional License
  - Second and subsequent job posting will be done as needed.
8. J-B.A.M. will continue to participate in job fairs hosted by 1Berkshire and Pittsfield community organizations. We will also host a job fair within our neighborhood to provide opportunities to our neighbors.

**Measurements-** We will measure the success of the Recruitment and Hiring Program on an ongoing basis as we begin to hire to ensure that we are doing all we can to meet our goal.

After 6 months of operation, and every 6 months thereafter, we will conduct a comprehensive evaluation of the Program and make necessary changes if needed. This comprehensive evaluation will include:

1. The number and percentage of employees who meet the criteria of the Program Populations that are outlined above;
2. The number and percentage of job applicants that meet the Program Population criteria;
3. The number of applicants that meet the Program Population criteria and if not hired, a description of the reason why; and
4. The number of job offers to applicants that meet the Program Population criteria and the reason (if known) what the applicant did not take the position

## **SUPPLIER/PARTNER PROGRAM**

**Goals-** The goal of the Supplier/Partner Program is to provide equity in the industry by promoting access to the industry by suppliers, contractor and wholesale partners who meet the Program Populations outlined above. J-B.A.M. is committed to utilizing, and will give priority to the extent possible, to minority-owned, women owned, veteran owned, LGBTQ+ owned and business owned by persons with disabilities as suppliers, contractors and wholesale partners.

J-B.A.M. recognizes that sourcing products and services from individuals and companies from these populations allows equitable access and revenues from legal cannabis.

**Our goal is to have at least 30% our suppliers, contractors and wholesale partners meet the criteria of the Program Populations that are outlined above.**

**Of this 30% our goal is to have 70% be minorities, 5-10% Veteran, 5-10% Persons with disabilities and 5-10% be persons who are LBGQTQ+**

**Program-** J-B.A.M. will actively identify and pursue partnerships with suppliers, contractors and Marijuana Establishments who meet the Program Populations that are outlined above.

1. J-B.A.M. will give preference to suppliers and contractors whose owners or employees meet the Program Populations outlined above.
2. We will actively recruit these individuals or companies and promote this Program when sourcing these services.
3. We will give priority to Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above when sourcing wholesale products.

**Measurement-** We will measure the success of the Supplier/Partner Program on an ongoing basis as we begin to contract individuals and companies for these services to ensure that we are doing all we can to meet our goal.

After 6 months of operation, and every 6 months thereafter, we will conduct a comprehensive evaluation of the Program and make necessary changes if needed. This comprehensive evaluation will include:

1. The number and percentage of suppliers and contractors that we have engaged with that meet the criteria of the Program Populations that are outlined above;
2. The number and percentage of bids received from these individuals and companies that meet the Program Population criteria;
3. The number of individuals and companies that meet the Program Population criteria and if not contracted with, a description of the reason why;
4. The number and percentage of Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above, that we have contracted

with as our wholesale partners; and 5. The number and percentage of Marijuana Establishments whose owners or a majority of its employees meet the Program Populations that are outlined above that we have engaged with that did not result in a wholesale agreement and the reasons why.

### **DIVERSITY PLAN EVALUATION**

In addition to evaluating the individual programs and goals outlined above, J-B.A.M. will perform an ongoing and comprehensive evaluation of this Diversity Plan as a whole to ensure that it promotes and provides equity to the Plan Populations. The progress or success of the plan must be documented upon renewal (one year from provisional licensure, and each year thereafter).

1. As we begin to recruit and hire potential employees the management team will evaluate the applicant pool to ensure that our recruitment policies are generating a diverse representation;
2. Periodically, the management team will evaluate the workplace climate through observations, employee meetings and individual conversations with individual employees to ensure our workplace is a place of inclusion;
3. 60 days prior to our license renewal (from provisional license) and annually thereafter the JB.A.M. management team will conduct a comprehensive evaluation of this plan that includes feedback from employees and stakeholders as to the effectiveness of its Programs and to see if the goals are attained; and
4. If, at any time, it is found that the plan is not reaching our goals, the executive management team will convene a special working group to evaluate the plan and make the necessary changes. This group may include outside consultants and professionals.