



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR285398
Original Issued Date: 03/13/2026
Issued Date: 03/13/2026
Expiration Date: 03/13/2027

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Kapnos, Inc.

Phone Number: 781-264-1233 Email Address: brianstriar@gmail.com

Business Address 1: 2 Merchant Street Business Address 2: Unit 4

Business City: Sharon Business State: MA Business Zip Code: 02067

Mailing Address 1: 2 Merchant Street Mailing Address 2: Unit 4

Mailing City: Sharon Mailing State: MA Mailing Zip Code: 02067

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: 20 Percentage Of Control: 20

Role: Owner / Partner Other Role:

First Name: Lynne Last Name: Striar Suffix:

Entity Legal Name: Kapnos, Inc. **Entity DBA:** Kapnos Cannabis Co. **DBA City:** Sharon

Entity Description: A Massachusetts Corporation

Foreign Subsidiary Narrative:

Entity Phone: 781-264-1233 **Entity Email:** brianstriar@gmail.com **Entity Website:** https://kapnoscannaco.com/

Entity Address 1: 2 Merchant St. **Entity Address 2:** Unit 4

Entity City: Sharon **Entity State:** MA **Entity Zip Code:** 02067

Entity Mailing Address 1: 2 Merchant St. **Entity Mailing Address 2:** Unit 4

Entity Mailing City: Sharon **Entity Mailing State:** MA **Entity Mailing Zip Code:** 02067

Relationship Description: Kapnos is the company that currently runs the cultivation at the same building and is expanding to the Marijuana Retailer.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Kapnos, Inc. **Entity DBA:** Kapnos Cannabis Co.

Email: brianstriar@gmail.com **Phone:** 781-264-1233

Address 1: 2 Merchant St. **Address 2:** Unit 4

City: Sharon **State:** MA **Zip Code:** 02067

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of Capital Provided:** \$100000 **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: Lynne **Last Name:** Striar **Suffix:**

Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

Individual 2

First Name: Cheryl **Last Name:** Giannopoulos **Suffix:**

Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

Individual 3

First Name: Soozen **Last Name:** Tribuna **Suffix:**

Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

Individual 4

First Name: Ralph **Last Name:** Morin **Suffix:** III
Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

Individual 5

First Name: Shivam **Last Name:** Patel **Suffix:**
Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

Individual 6

First Name: Jignesh **Last Name:** Pachani **Suffix:**
Marijuana Establishment Name: Kapnos, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Sharon **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 2 Merchant St., Unit 4
Establishment Address 2:
Establishment City: Sharon **Establishment Zip Code:** 02067
Approximate square footage of the establishment: 1442 **How many abutters does this property have?:** 10
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Kapnos, Inc. - Plan to Remain Compliant.pdf	pdf	67f0fb693b8f2e45c6e7c250	04/05/2025
Community Outreach Meeting Documentation	Kapnos, Inc. - 04.09.20_Form_COM_Attestation (Complete).pdf	pdf	681f23ce954c173426b7777c	05/10/2025
Executed HCA	Kapnos, Inc. - HCA (2025).pdf	pdf	688b7aee2e0e7d3801287002	07/31/2025
Community Outreach Meeting Documentation	RFI Responses to CCC RE Community Outreach.pdf	pdf	688b7f912e0e7d3801287b2f	07/31/2025

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

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Other	Equitable Opportunities Now (EON) 2025 Donation Acknowledgement Letter to Kapnos Cannabis Co. .pdf	pdf	6894a54197444ac6c4b6fbb2	08/07/2025
Plan for Positive Impact	Kapnos Plan for Positive Impact.v.10.6.25.1.pdf	pdf	68e3b654366765b777bbb287	10/06/2025

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Director **Other Role:**
First Name: Lynne **Last Name:** Striar **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Director **Other Role:**
First Name: Cheryl **Last Name:** Giannopoulos **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 3

Role: Director **Other Role:** Owner
First Name: Jignesh **Last Name:** Pachani **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Owner / Partner **Other Role:**
First Name: Shivam **Last Name:** Patel **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 5

Role: Director **Other Role:** Owner
First Name: Ralph **Last Name:** Morin **Suffix:** III
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 6

Role: Director **Other Role:** Owner
First Name: Soozen **Last Name:** Tribuna **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:**
Entity Legal Name: Kapnos, Inc. **Entity DBA:** Kapnos Cannabis Co.
Entity Description: Proposed Licensee and Existing Marijuana Cultivator Licensee
Phone: 781-264-1233 **Email:** brianstriar@gmail.com
Primary Business Address 1: 2 Merchant St. **Primary Business Address 2:** Unit 4
Primary Business City: Sharon **Primary Business State:** MA **Principal Business Zip:**

Additional Information: This is the existing licensee, simply applying for a Marijuana Retailer license in addition to its existing Marijuana Cultivator license. This is the first time in my experience the CCC has asked to background check the existing licensee again.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Kapnos, Inc. - Articles of Organization.pdf	pdf	67f568483b8f2e45c6ea3c02	04/08/2025
Bylaws	Kapnos, Inc. - Corporate Bylaws.pdf	pdf	67f56910d80aaa0db448c507	04/08/2025
Secretary of Commonwealth - Certificate of Good Standing	Kapnos, Inc. - Certificate of Good Standing from the Secretary of the Commonwealth of Massachusetts.pdf	pdf	67f62d1bd80aaa0db4496bd6	04/09/2025
Department of Unemployment Assistance - Certificate of Good standing	Kapnos DUA Certificate of Compliance.pdf	pdf	685c3f9509aba19a8bd72200	06/25/2025
Department of Revenue - Certificate of Good standing	Kapnos Certificate of Good Standing Department of Revenue.pdf	pdf	688ba5a32e0e7d380128dfca	07/31/2025

No documents uploaded

Massachusetts Business Identification Number: 001451809

Doing-Business-As Name: Kapnos Cannabis Co.

DBA Registration City: Sharon

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Operating Agreement or Articles of Incorporation	Kapnos, Inc. - Articles of Organization.pdf	pdf	67f404fdd80aaa0db447438a	04/07/2025
Business Plan	Kapnos, Inc. - Business Plan.pdf	pdf	68003736d80aaa0db45063a4	04/16/2025
Plan for Liability Insurance	Certificate of Insurance.pdf	pdf	689b3e031eca271ddd9fbb85	08/12/2025
Capitalization Table	Capitalization Table of Kapnos, Inc. (10.6.25.1).pdf	pdf	68e3fb6a5c55e822b03da76c	10/06/2025
Proposed Timeline	Kapnos, Inc. - Proposed Timeline.v.11.5.25.pdf	pdf	690b7c17af1485a6ac51e256	11/05/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Dispensing procedures	DISPENSING PROCEDURES.pdf	pdf	67f62bc63b8f2e45c6ead76a	04/09/2025
Energy Compliance Plan	ENERGY COMPLIANCE PLAN.pdf	pdf	67f62bc7d80aaa0db4496b3a	04/09/2025
Inventory procedures	INVENTORY PROCEDURES.pdf	pdf	67f62bc93b8f2e45c6ead784	04/09/2025

Maintaining of financial records	MAINTAINING OF FINANCIAL RECORDS.pdf	pdf	67f62bcb3b8f2e45c6ead798	04/09/2025
Personnel policies including background checks	PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS.pdf	pdf	67f62bccd80aaa0db4496b4e	04/09/2025
Plan for obtaining marijuana or marijuana products	PLAN FOR OBTAINING MARIJUANA AND MARIJUANA PRODUCTS.pdf	pdf	67f62befd80aaa0db4496b65	04/09/2025
Restricting Access to age 21 and older	PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER.pdf	pdf	67f62bf13b8f2e45c6ead7af	04/09/2025
Prevention of diversion	PREVENTION OF DIVERSION.pdf	pdf	67f62bf3d80aaa0db4496b79	04/09/2025
Qualifications and training	QUALIFICATIONS AND TRAINING.pdf	pdf	67f62bf4d80aaa0db4496b8d	04/09/2025
Quality control and testing	QUALITY CONTROL AND TESTING.pdf	pdf	67f62bf73b8f2e45c6ead7c3	04/09/2025
Record Keeping procedures	RECORDKEEPING PROCEDURES.pdf	pdf	67f62c0e3b8f2e45c6ead7da	04/09/2025
Security plan	SECURITY PLAN.pdf	pdf	67f62c0fd80aaa0db4496ba4	04/09/2025
Storage of marijuana	STORAGE OF MARIJUANA.pdf	pdf	67f62c113b8f2e45c6ead7ee	04/09/2025
Transportation of marijuana	TRANSPORTATION OF MARIJUANA.pdf	pdf	67f62c133b8f2e45c6ead802	04/09/2025
Diversity plan	Kapnos, Inc. - Diversity Plan.v.7.31.25.2.pdf	pdf	688bd9a9f40040df055c1ecc	07/31/2025

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 10:00 PM
Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 10:00 PM
Saturday From: 9:00 AM	Saturday To: 10:00 PM
Sunday From: 9:00 AM	Sunday To: 10:00 PM

Kapnos, Inc.
Application #: MRN285398
Plan to Remain Compliant

Kapnos, Inc. (“Kapnos”) currently operates a Marijuana Cultivator in Sharon, and as such knows Sharon’s Zoning Bylaws related to Marijuana Establishments, particularly Chapter 7.3 of Chapter 275. Kapnos’ proposed Marijuana Retailer will be sited in the properly zoned area of Sharon. Kapnos has been awarded Site Plan Approval for the facility, and will obtain a Special Permit, should the Town require such permit in addition to Kapnos’ existing Special Permit for its Marijuana Cultivator. Kapnos has also been awarded a Host Community Agreement for the proposed Marijuana Retailer use, included with this application. Kapnos will at all times remain compliant with its Site Plan Approval, its HCA, the Zoning Bylaw as may be amended, and any Special Permit that may be awarded. Kapnos will not operate without obtaining all requisite local permitting.

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.



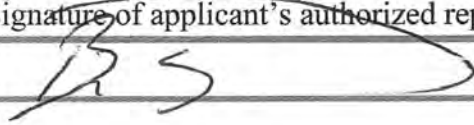
Name of applicant:

Kapnos Inc. DBA Kapnos Cannabis Company

Name of applicant's authorized representative:

Brian Striar

Signature of applicant's authorized representative:



LOCALiQ

NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

AFFIDAVIT OF PUBLICATION

Brian Striar
Kapnos, Inc.
584 Mountain Street
Sharon MA 02067

2 MERCHANT STREET,
SHARON
LEGAL NOTICE

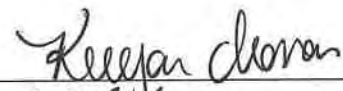
STATE OF MASSACHUSETTS, COUNTY OF NORFOLK

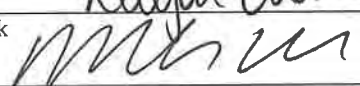
The Patriot Ledger, a newspaper printed and published in the city of Quincy, and of general circulation in the County of Norfolk, State of Massachusetts, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

03/12/2025

and that the fees charged are legal.

Sworn to and subscribed before on 03/12/2025



Legal Clerk


Notary, State of WI, County of Brown

8.25.26

My commission expires

Publication Cost: \$121.61
Tax Amount: \$0.00
Payment Cost: \$121.61
Order No: 11113530 # of Copies:
Customer No: 662904 1
PO #:

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance

MARIAH VERHAGEN
Notary Public
State of Wisconsin

Notice of Community Outreach Meeting: This notice is hereby given that the community outreach meeting for a proposed marijuana retail establishment by Kapnos Inc. is scheduled for March 27, 2025 at 7 PM. The meeting will be held onsite to discuss the proposed marijuana retail establishment at 2 Merchant Street suite 4 in Sharon MA. 02067. Please rsvp and send all inquiries to Brianstriar@gmail.com, thank you.

#11113530
PL 3/12/25

RECEIVED
CLERK'S OFFICE
SHARON, MA 02067

LOCALIQ

NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

2025 MAR 17 AM 11:41

AFFIDAVIT OF PUBLICATION

Brian Striar
Kapnos, Inc.
584 Mountain Street
Sharon MA 02067

STATE OF MASSACHUSETTS, COUNTY OF NORFOLK

The Patriot Ledger, a newspaper printed and published in the city of Quincy, and of general circulation in the County of Norfolk, State of Massachusetts, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

03/12/2025

and that the fees charged are legal.

Sworn to and subscribed before on 03/12/2025

Keegan Donovan

Legal Clerk

[Signature]

Notary, State of WI, County of Brown

8-25-26

2 MERCHANT STREET, SHARON LEGAL NOTICE

Notice of Community Outreach Meeting: This notice is hereby given that the community outreach meeting for a proposed marijuana retail establishment by Kapnos Inc. is scheduled for March 27, 2025 at 7 PM. The meeting will be held onsite to discuss the proposed marijuana retail establishment at 2 Merchant Street suite 4 in Sharon MA. 02067. Please rsvp and send all inquiries to Brianstriar@gmail.com, thank you.

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PL 3/12/25

My commission expires

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Order No: 11113530

of Copies:

Customer No: 662904

1

PO #:

THIS IS NOT AN INVOICE!

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MARIAH VERHAGEN
Notary Public
State of Wisconsin

Kapnos, Inc.
2 Merchant St., Unit 4
Sharon, MA 02067

April 9, 2025

DECLARATION OF BRIAN STRIAR RE MAILING OF ABUTTER NOTICES

I, Brian Striar, hereby declare and state as follows:

1. I am over the age of eighteen (18) and competent to make this declaration.
2. I am a representative of Kapnos Inc., a Massachusetts corporation seeking licensure as a Marijuana Retailer in the Town of Sharon, Massachusetts.
3. On March 19, 2025, I personally prepared and mailed notices via the United States Postal Service (USPS) to all abutters listed on a Certified Abutters List provided by the Town of Sharon, Massachusetts.
4. The notices mailed informed abutters of the Community Outreach Meeting to be held by Kapnos Inc. in accordance with 935 CMR 500.101(1)(a)(9), and included all required information as outlined by the Cannabis Control Commission.
5. Attached hereto as Exhibit A is a true and accurate copy of the notice that was mailed to the abutters.
6. Attached hereto as Exhibit B is a true and accurate copy of the Certified Abutters List issued by the Town of Sharon.

I declare under the pains and penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 9TH day of April, 2025, in Sharon, MA.

Brian Striar

ID MSr1pPFAI9eUzuamrkm9sR3

Brian Striar

eSignature Details

Signer ID:	MSr1pPfAt9eUzuamrkmt9sR3
Signed by:	Brian Striar
Sent to email:	brianstriar@gmail.com
IP Address:	76.152.196.14
Signed at:	Apr 17 2025, 11:31 am EDT

LOCALiQ

NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

AFFIDAVIT OF PUBLICATION

Brian Striar
Kapnos, Inc.
584 Mountain Street
Sharon MA 02067

2 MERCHANT STREET, SHARON LEGAL NOTICE

STATE OF MASSACHUSETTS, COUNTY OF NORFOLK

The Patriot Ledger, a newspaper printed and published in the city of Quincy, and of general circulation in the County of Norfolk, State of Massachusetts, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

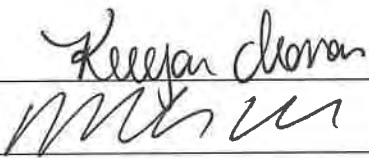
03/12/2025

and that the fees charged are legal.

Sworn to and subscribed before on 03/12/2025

Notice of Community Outreach Meeting: This notice is hereby given that the community outreach meeting for a proposed marijuana retail establishment by Kapnos Inc. is scheduled for March 27, 2025 at 7 PM. The meeting will be held onsite to discuss the proposed marijuana retail establishment at 2 Merchant Street suite 4 in Sharon MA. 02067. Please rsvp and send all inquiries to Brianstriar@gmail.com, thank you.

Legal Clerk



Notary, State of WI, County of Brown

8.25.26

#11113530
PL 3/12/25

My commission expires

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PO #:		

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MARIAH VERHAGEN
Notary Public
State of Wisconsin



Town of Sharon

90 South Main Street
Sharon, MA 02067

Tel. 781 784-1500 x1207
aoffice@townofsharon.org

Request for abutter's list

Name of organization: Kapnos Inc

Person filing request: Brian Striar Title: operations mgr.

Address: 2 Merchant St

Telephone # 781 264 1233 Email: Brianstriar@gmail.com

Subject property: 2 Merchant St 086 011 003

- Planning Board 500'
- Zoning Board of Appeals 300' (2)
- Conservation 300'
- Board of Health 200'
- Historical Commission 200'
- Liquor License – Direct Abutters and Churches and Schools within 500'

RECEIVED
MAR 05 2025
TOWN OF SHARON
BOARD OF ASSESSORS

Fee: \$0.50 per abutter; \$6.00 minimum

\$10.00

Date: 3/5/25

Please allow ten (10) days for completion of this request.

This form can be submitted electronically, sent via regular mail or in person at the Assessor's Office.

Once the form is received and abutters list is completed the Assessor's Office will notify you via email or phone with fee and pick up date.

TOWN OF SHARON



ELLEN W. ABELSON
RICHARD B. GORDEN, M.A.A.
ANNE M. CARNEY

OFFICE OF THE
BOARD OF ASSESSORS

90 SOUTH MAIN ST.
SHARON, MASSACHUSETTS 02067

TEL. (781) 784-1500 ext 1207

March 5, 2025

Re: 2 MERCHANT STREET
Parcel # 086-011-003

TO WHOM IT MAY CONCERN:

I, Jeffery L. Funk, Administrative Assessor of the Town of Sharon, hereby certify that attached is a list of abutters in the Town of Sharon within 300' radius of the above mentioned location in the Town of Sharon. This list is compiled from the record of the Board of Assessors most recent tax assessment.

BOARD OF ASSESSORS

Jeffery L. Funk, M.A.A.

Enclosure



300 feet Abutters List Report

Sharon, MA
March 05, 2025

Subject Property:

Parcel Number: 86-11-3
CAMA Number: 86-11-3
Property Address: 2-4 MERCHANT ST

Mailing Address: A GIANNOPOULOS, LLC
173 BELGRADE AVE
BOSTON, MA 02131

Abutters:

Parcel Number: 86-10-1
CAMA Number: 86-10-1
Property Address: 1200 GENERAL EDWARDS HWY

Mailing Address: 415 N. DEARBORN STREET
CHICAGO, IL 60654

Parcel Number: 86-11-1
CAMA Number: 86-11-1
Property Address: 10 MERCHANT ST

Mailing Address: 7 WEST STREET
WALPOLE, MA 02081

Parcel Number: 86-11-2
CAMA Number: 86-11-2
Property Address: 6-8 MERCHANT ST

Mailing Address: 190 NORTH MAIN ST
NATICK, MA 01760

Parcel Number: 86-12
CAMA Number: 86-12
Property Address: 15 MERCHANT ST

Mailing Address: 15 MERCHANT ST
SHARON, MA 02067

Parcel Number: 86-13
CAMA Number: 86-13
Property Address: 9 MERCHANT ST

Mailing Address: 70 ARDMORE RD
NEEDHAM, MA 02494

Parcel Number: 86-14
CAMA Number: 86-14
Property Address: 5 MERCHANT ST

Mailing Address: 5 MERCHANT ST
SHARON, MA 02067

Parcel Number: 86-15
CAMA Number: 86-15
Property Address: 1 MERCHANT ST

Mailing Address: 115 MAIN ST SUITE 1D
NORTH EASTON, MA 02356

Parcel Number: 86-3
CAMA Number: 86-3
Property Address: 1225 GENERAL EDWARDS HWY

Mailing Address: 7 WEST ST
WALPOLE, MA 02081

Parcel Number: 86-4
CAMA Number: 86-4
Property Address: 1205 GENERAL EDWARDS HWY

Mailing Address: 1205 GENERAL EDWARDS HWY
SHARON, MA 02067

Parcel Number: 86-9
CAMA Number: 86-9
Property Address: 1180 GENERAL EDWARDS HWY

Mailing Address: 10 BALLARD RD
LAWRENCE, MA 01843



www.cai-tech.com

Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.

RFI Responses to CCC’s July 21, 2025 RFI for Kapnos’s Proposed Marijuana Retailer at 2 Merchant St., Suite 4, Sharon, MA 02067.

5. Host Community Information (Community Outreach Documentation).

Documentation showing the applicant published the Community Outreach Notice in a newspaper of general circulation and provided at least 14 calendar day notice. . 935 CMR 500.101(1) and (2) (required)

<input type="checkbox"/> COMPLIANT	<input checked="" type="checkbox"/> MORE INFORMATION REQUIRED	<input type="checkbox"/> N/A
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Note: Please provide evidence of a newspaper article showing the public notification of the Community Outreach Meeting. The article shall show the date of the meeting, the publication name, and contain the address of the proposed establishment as well as, the time, place, and subject matter of the Community Outreach Meeting.

This was already provided in both Attachment A, and Attachment B to the Community Outreach Meeting Attestation Form. Those attachments are “Affidavit of Publication” from the Localiq, for publication in The Patriot Ledger, on March 27, 2025, with the address of 2 Merchant St., Suite 4, Sharon, MA 02067, and the subject matter as, “to discuss the proposed marijuana retail establishment at 2 Merchant Street suite 4 in Sharon MA. 02067.”

Each element is present.

6. Host Community Information (Community Outreach Documentation).

Documentation showing the applicant filed a copy of the Community Outreach Notice to the city or town clerk of the host community. 935 CMR 500.101(1)

<input type="checkbox"/> COMPLIANT	<input checked="" type="checkbox"/> MORE INFORMATION REQUIRED	<input type="checkbox"/> N/A
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Note: Please provide a document showing the applicant filed a copy of the Community Outreach Notice to the city or town clerk of the host community.

This was provided as Attachment B to the Community Outreach Meeting Attestation Form where a stamp from the Clerk of Sharon is clear on the top left corner of the page.

7. Host Community Information (Community Outreach Documentation).

Documentation showing the applicant sent a copy of the notice to all abutters within 300 feet of the property line of the proposed establishment. *935 CMR 500.101(1)*

<input type="checkbox"/> COMPLIANT	<input checked="" type="checkbox"/> MORE INFORMATION REQUIRED	<input type="checkbox"/> N/A
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Note Please provide a copy of the notice given to all abutters within 300 feet of the proposed establishment. Additionally, please ensure the names are redacted from the documentation.

This is clearly provided as Attachment C to the Community Outreach Meeting Attestation Form, page 8 of that PDF.

PLAN FOR POSITIVE IMPACT

PURPOSE

Cannabis prohibition has disproportionately impacted certain communities in Massachusetts. Kapnos, Inc. (“Kapnos”) recognizes that it has a responsibility to contribute to the communities in which it does business and the surrounding areas in need. Kapnos is fully committed to ensuring that it is making positive and lasting contributions to the communities where the company resides as well as neighboring localities that have been disproportionately impacted.

GOALS, PROGRAMS, AND METRICS

Kapnos aims to implement the following initiative to assist those communities that have been disproportionately impacted. Proposed Initiative: Kapnos will make minimum annual financial contributions of at least \$5,000 to Equitable Opportunities Now (EON). EON exists to educate and empower people of color to become active participants in the Massachusetts legal cannabis market surrounding Sharon, specifically in the areas of disproportionate impact of Randolph and Brockton.

Goal 1: To ensure equitable ownership and employment opportunities for those in the surrounding minority and underrepresented communities of Randolph and Brockton. This goal is tailored specifically to address the Commission-approved areas of disproportionate impact by empowering specific communities and individuals that have been disproportionately impacted to overcome that disproportionate impact by offering them a pathway to participation in the legal cannabis market. We could think of no better way to overcome the disproportionate impact than contributing to bringing these individuals into the industry that used to be illegal and for which they had been disproportionately impacted. We believe that EON will assist at least 10 individuals in the Randolph and Brockton with equitable ownership and or employment opportunities.

Program: Kapnos will make minimum annual contributions of \$5,000 EON, which will in turn support and empower those affected by the War on Drugs to ensure equitable ownership and employment opportunities for those in the surrounding minority and underrepresented communities of Randolph and Brockton.

Metrics: Kapnos will maintain a record of its annual donations EON, and any information provided by EON as to what these donations were spent on to support EON’s stated goal, where these donations were spent, who these donations were spent on, and how many people these donations have helped. Kapnos will keep records of feedback that we receive relative to the impact of our contributions, if any. This will in turn help us make decisions about adjustments that need to be made in the future.

Goal 2: Provide access to the wholesale market for communities that have been disproportionately impacted by the war on drugs, including Randolph and Brockton. Kapnos' goal is to allocate 10% of its product to Social Equity license holders by the end of the company's first year of business, 25% by the end of year two, and up to 50% by the end of year three.

Program: Kapnos will offer Economic Empowerment and Social Equity license holders, particularly from these communities, a “first right to purchase” up to fifty percent of our available wholesale products, which will. Frequency: always. Duration: Always. Target audience: Social Equity and Economic Empowerment license holders, particularly those from Randolph and Brockton.

Metrics: Kapnos will count the number of individuals that are Economic Empowerment and Social Equity license holders that purchase wholesale products from Kapnos. Kapnos will maintain records of each Economic Empowerment and Social Equity license holders that participates in the “first right to purchase” initiative. Kapnos will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

Kapnos acknowledges that any actions taken or programs instituted pursuant to this Plan will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.

Kapnos acknowledges that the progress or success of this Plan must be documented upon renewal (one year from provisional licensure, and each year thereafter).



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001451809

ARTICLE I

The exact name of the corporation is:

KAPNOS, INC.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D 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.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CNP	\$0.00000	10,000	\$0.00	1,000

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

ARTICLE VI

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

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

ARTICLE VII

The effective date of organization 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.

Later Effective Date: Time:

ARTICLE VIII

The information contained in Article VIII is not a permanent part of the Articles of Organization.

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Name: IAN C. HEDGES
No. and Street: 480 TURNPIKE STREET
City or Town: SOUTH EASTON State: MA Zip: 02375 Country: USA

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):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	LYNNE STRIAR	584 MOUNTAIN STREET SHARON, MA 02067 USA
TREASURER	LYNNE STRIAR	584 MOUNTAIN STREET SHARON, MA 02067 USA
SECRETARY	CHERYL GIANNOPOULOS	68 LAKESHORE DRIVE WESTWOOD, MA 02090 USA
VICE PRESIDENT	CHERYL GIANNOPOULOS	68 LAKESHORE DRIVE WESTWOOD, MA 02090 USA
DIRECTOR	LYNNE STRIAR	584 MOUNTAIN STREET SHARON, MA 02067 USA
DIRECTOR	CHERYL GIANNOPOULOS	68 LAKESHORE DRIVE WESTWOOD, MA 02090 USA

d. The fiscal year end (i.e., tax year) of the corporation:
December

e. A brief description of the type of business in which the corporation intends to engage:

APPLY FOR A MARIJUANA CULTIVATOR LICENSE

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

No. and Street: 2 MERCHANT STREET
UNIT #3
City or Town: SHARON State: MA Zip: 02067 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: 2 MERCHANT STREET
UNIT #3
City or Town: SHARON State: MA Zip: 02067 Country: USA

which is

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

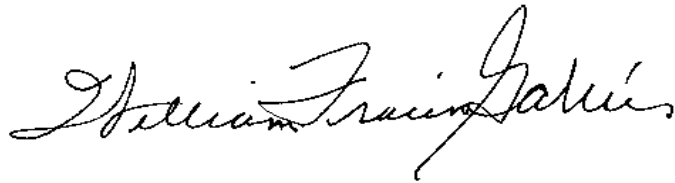
Signed this 5 Day of August, 2020 at 11:55:49 AM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

LYNNE STRIAR

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:

August 05, 2020 11:55 AM

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
Kapnos, Inc.

ARTICLE I
Articles of Organization

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

ARTICLE II
Annual Meeting of Stockholders

The annual meeting of stockholders shall be held on the third February of each year at 2 Merchant Street, #3, Sharon, Massachusetts at 2pm local time (or at such other hour as may be fixed by vote of the Board of Directors, or if the Board shall not fix such hour, as may be determined by the President, and set forth in the notice thereof), unless that day be a legal holiday at the site of the meeting, in which case the meeting shall be held at the same hour on the next succeeding business day at the site of the meeting. Purposes for which an annual meeting is to be held, in addition to those prescribed by law, by the Articles of Organization and by these By-Laws, may be specified by the President or by a vote of majority of the directors then in office or by one or more stockholders who are entitled to vote and who hold at least one-tenth part in interest of the capital stock entitled to vote at the meeting.

If such annual meeting is omitted on the day herein provided therefor, a special meeting of the stockholders may be held in lieu thereof, and any business transacted or elections held at such special meeting shall have the same effect as if transacted or held at the annual meeting and, in such case, all references in these By-Laws, except in this Article II and in Article IV, to such special meeting. Any such special meeting shall be called, and the purposes thereof shall be specified in the call, as provided in Article III.

ARTICLE III
Special Meeting of Stockholders

A special meeting of the stockholders may be called at any time by the President or by a majority of the directors then in office. A special meeting of the stockholders shall be called by the Clerk or, in the case of the death, absence, incapacity or refusal of the Clerk, by any other officer, upon written application of one or more stockholders who hold at least one-tenth part in interest of

the capital stock entitled to vote at the meeting. Such call shall state the time, place and purposes of the meeting.

ARTICLE IV Place of Stockholders' Meetings

The annual meeting of the stockholders and any special meeting of the stockholders, by whomever called, shall be held at the principal office of the Corporation in Massachusetts, or at such other place in Massachusetts or within the continental limits of the United States of America as may be determined by the person or persons calling such meeting or on whose behalf such meeting was called and stated in the notice thereof. Any adjourned session of any annual or special meeting of the stockholders shall be held in the United States at such place as is designated in the vote of adjournment.

ARTICLE V Notice of Stockholders' Meetings

A written notice of each annual or special meeting of stockholders, stating the place, date and hour thereof, and the purpose or purposes for which the meeting is to be held shall be given at least seven days before the meeting to each stockholder, entitled to vote thereat, and to each stockholder who, under the Articles of Organization or these By-Laws, is entitled to such notice, by leaving such notice with him or at his residence or usual place of business, or by mailing it, postage prepaid, addressed to such stockholder at his address as it appears in the records of the Corporation. Such notice shall be given by the Clerk, or by any other officer, or by a person designated either by the Clerk or by the person or persons calling the meeting, or by the Board of Directors. No notice of the time, place or purposes of any annual or special meeting of the stockholders shall be required to be given to a stockholder if a written waiver of such notice is executed before or after the meeting by such stockholder, or his attorney thereunto authorized, and filed with the records of the meeting.

ARTICLE VI Capital Stock

The total number of shares and the par value, if any, of each class of stock which the corporation is authorized to issue shall be stated in the articles of organization. The Board of Directors may at any time issue all or from time to time any part of the unissued capital stock of the corporation from time to time authorized under the articles of organization, and may determine, subject to any requirements of law, the consideration for which stock is to be issued and the manner of allocating such consideration between capital and surplus.

Each stockholder shall be entitled to a certificate or certificates stating the number and the class and the designation of the series, if any, of the shares held by him, and otherwise in form approved by the board of directors. Such certificate or certificates shall be signed by the president or a vice president and by the treasurer or an assistant treasurer. Such signature may be facsimiles if the certificate is signed by a transfer agent, or by a registrar, other than a director, officer or employee of the corporation. In case any officer who has signed or whose facsimile signature has been placed on such certificate shall have ceased to be such officer before such certificate is issued,

it may be issued by the corporation with the same effect as if he were such officer at the time of its issue.

Every certificate issued for shares of stock at a time when such shares are subject to any restriction on transfer pursuant to the articles of organization, these bylaws or any agreement to which the corporation is a party shall have the restriction noted conspicuously on the certificate and shall also set forth on the face or back of the certificate either (i) the full text of the restriction or (ii) a statement of the existence of such restriction and a statement that the corporation will furnish a copy thereof to the holder of such certificate upon written request and without charge.

Every certificate issued for shares of stock at a time when the corporation is authorized to issue more than one class or series of stock shall set forth on the face or back of the certificate either (i) the full text of the preferences, voting powers, qualifications and special and relative rights of the shares of each class and series, if any, authorized to be issued, as set forth in the articles of organization or (ii) a statement of the existence of such preferences, powers, qualifications and rights and a statement that the corporation will furnish a copy thereof to the holder of such certificate upon written request and without charge.

ARTICLE VII

Voting, Proxies, and Stockholder Action Without a Meeting

At any meeting of the stockholders, a quorum shall consist of a majority in interest of all stock issued and outstanding. Stockholders entitled to vote shall have one vote for each share of stock entitled to vote owned by them. No ballot shall be required for the election of directors unless requested by a stockholder present or represented at the meeting and entitled to vote in the election. The Corporation shall not, directly or indirectly, vote upon any share of its own stock.

When a quorum is present at any meeting, a plurality of the votes properly cast for any office shall elect to such office, except where a larger vote is required by law, by the Articles of Organization or by these By-Laws, and a majority of the votes properly cast upon any other question shall, except in any case where a larger vote is required by law, by the Articles of Organization or by these By-Laws, decide the matter.

Stockholders entitled to vote may vote either in person or by proxy in writing dated not more than six months before the meeting named therein, which proxies shall be filed with the Clerk of the meeting, or any adjournment thereof, before being voted. Such proxies shall entitle the holders thereof to vote at any adjournment of such meeting but shall not be valid after the final adjournment of such meeting.

Any action to be taken by stockholders may be taken without a meeting if all stockholders entitled to vote on the matter consent to the action by a writing or writings, filed with the records of the meetings of stockholders. Such consent shall be treated for all purposes as a vote at a meeting.

ARTICLE VIII Board of Directors; Qualification

A Board of no more than five directors shall be elected annually at the annual meeting of the stockholders. The Corporation may operate with any number of Directors under five, regardless of the number of owners/shareholders of the Corporation.

At any time during any year, the Board of Directors may be enlarged within the aforesaid limits by the stockholders at a meeting called for the purpose or by the vote of a majority of the directors then in office. The Board of Directors may be reduced by the stockholders at a meeting called for the purpose. With respect to a reduction, the particular directorships which shall terminate shall be determined by the stockholders, in each case by vote of a majority of the stock outstanding and entitled to vote for the election of directors or, in the case of a reduction which involves the termination of the directorship of an incumbent director, by such larger vote, if any, as would be required to remove such incumbent from office.

Each newly-created directorship resulting from any increase in the number of directors may be filled in the manner provided in Article XIV.

No director need be a stockholder except as may be otherwise provided by law, by the Articles of Organization or these By-Laws. Each director shall hold office until the election of a board of directors at the next annual meeting of stockholders and until his successor is elected and qualified, or his earlier resignation, removal or death. Any director may resign at any time by delivering his written resignation to the President, the Clerk or a meeting of the Board of Directors. The Corporation may operate with a single Director regardless of the number of owners/shareholders of the Corporation.

Directors as such shall not receive any stated salary for their services but by resolution of the Board a fixed sum and expenses of attendance if any may be allowed for attendance at Board meetings. Nothing herein shall be construed to preclude a director from serving the Corporation in any other capacity and receiving remuneration for such services.

ARTICLE IX Powers of Directors

The business and property of the Corporation shall be managed by, and be under the control of, the Board of Directors which shall have and may exercise all the powers of the Corporation except such as the reserved to or conferred upon the stockholder or cooperate officers by law, by the Articles of Organization, or by these By-Laws.

Except as may be otherwise specifically provided by law, by the Articles of Organization or by vote of the stockholders, the Board of Directors is expressly authorized to issue, from time to time, all or any portion or portions of the capital stock of the Corporation of any class, which may have been authorized but not issued or otherwise reserved for issue, for such consideration (but not

less than the par value thereof in case of stock having par value), whether cash, tangible or intangible property, services or expenses, as it may deem best.

ARTICLE X

Meetings of the Board of Directors: Action Without a Meeting; Telephonic Meetings

Regular meetings of the Board of Directors may be held without call or notice at such places and at such times as the Board may from time to time determine, *provided* that reasonable notice of such determination and of any changes therein is given to each member of the Board then in office. A regular meeting of the Board of Directors for the purpose of electing officers and agents may be held without call or notice immediately after and at the same place as the annual meeting of the stockholders and, if held upon due call or notice, for such other and further purposes as may be specified in such call or notice.

Special meetings of the Board of Directors may be held at any time and at any place when called by the President, the Treasurer, or by a director, reasonable notice thereof being given to each director by the Clerk, or, in the case of death, absence, incapacity or refusal of the Clerk, by the officer or directors calling the meeting. In any case, it shall be deemed sufficient notice to a director to send notice by mail at least forty-eight hours, or by telegram at least twenty-four hours, before the meeting, addressed to him at his usual or last known business or residence address or to give notice to him in person, either by telephone or by handing him a written notice at least twenty-four hours before the meeting.

Notwithstanding the foregoing, notice of a meeting need not be given to any director if a written waiver of notice, executed by him before or after the meeting, is filed with the records of the meeting, or to any director who attends the meeting without protesting prior thereto, or at its commencement, the lack of notice to him.

Any action required or permitted to be taken at any meeting of the directors may be taken without a meeting if a written consent is filed with the records of the meetings of the directors.

Members of the Board of Directors may participate in a meeting of the Board by means of a conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other at the same time and participation by such means shall constitute presence in person at a meeting.

ARTICLE XI

Officers; Qualification

The officers of the Corporation shall be a President, a Treasurer, a Clerk, and such other officers, which may include one or more Vice Presidents, a Secretary, a Controller, Assistant Treasurers, Assistant Secretaries, Assistant Clerks, or Assistant Controllers, as the Board of Directors may, in its discretion, elect or appoint. The President need not be a director. The Clerk shall be a resident of Massachusetts unless the Corporation has a resident agent appointed for the

purpose of receiving service of process. So far as is permitted by law, any two or more offices may be held by the same person.

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

The President, Treasurer and the Clerk shall be elected annually by the Directors at its first meeting following the annual meeting of stockholders, by vote of a majority of the full Board of Directors. Such other offices of the Corporation as may be created in accordance with these By-Laws may be filled at such meeting by vote of a majority of the full Board of Directors, or at any other time by vote of a majority of the directors then in office.

Each officer shall hold office until the first meeting of the Board of Directors following the next annual meeting of the stockholders and until his successor shall have been elected and qualified or his earlier resignation, removal or death. Any officer may resign at any time by delivering his written resignation to the President, the Clerk or a meeting of the Board of Directors.

ARTICLE XII

President and Vice Presidents

The President shall be the chief executive officer of the Corporation and shall have general charge and supervision of the business of the Corporation unless otherwise provided by law, the Articles of Organization, the By-Laws, or specific vote of the Board of Directors. The President shall preside at meetings of the stockholders and, if a director, of the Board of Directors, except as otherwise voted by the stockholders or the Board of Directors.

Any Vice President shall have such duties and powers as shall be designated from time to time by the Board of Directors or by the President and, in any case, shall be responsible to and shall report to the President. Unless otherwise designated by the Board of Directors, in the absence or disability of the President, the Vice President or, if there be more than one, the Vice Presidents in order designated by the Board of Directors shall have the powers of and perform the duties of the President.

ARTICLE XIII

Treasurer and Assistant Treasurer

The Treasurer shall be the chief financial and accounting officer of the Corporation and shall be in charge of its accounting records and procedures, its funds and the disbursements thereof, subject to the President and the Board of Directors, and shall have such duties and powers as are commonly incident to the office of a corporate treasurer and such other duties and powers as may be prescribed from time to time by the Board of Directors or by the President. The Treasurer shall be responsible to and shall report to the Board of Directors, but in the ordinary conduct of the Corporation's business, shall be under the supervision of the President.

Any Assistant Treasurer shall have such duties and powers as shall be prescribed from time to time by the Board of Directors or by the Treasurer and shall be responsible to and shall report to the Treasurer. Unless otherwise designated by the Board of Directors, the Assistant Treasurer or, if there be more than one, the Assistant Treasurers in the order designated by the Board of Directors, shall, in the absence or disability of the Treasurer, have the powers of and perform the duties of the Treasurer.

ARTICLE XIV Clerk and Assistant Clerk

The Clerk shall record all proceedings of the stockholders and Board of Directors in books to be kept therefor, and shall have custody of the Corporation's records, documents and valuable papers. In the absence of the Clerk and all Assistant Clerks from any such meeting, a temporary Clerk shall be chosen by vote of the meeting to record the proceedings thereof in the aforesaid books.

The Clerk shall keep, or cause to be kept, the stock transfer records of the Corporation which shall contain a complete list of the names and addresses of all stockholders and the amount of stock held by each. In addition, the Clerk shall have the custody of the corporate seal and be responsible for affixing it to documents as required unless the Board of Directors shall designate otherwise.

Any Assistant Clerk shall have such powers and perform such duties as shall from time to time be designated by the Board of Directors or the Clerk and shall be responsible to and shall report to the Clerk.

ARTICLE XV Vacancies

Any vacancy in the Board of Directors however occurring, including a vacancy resulting from the enlargement of the Board and any vacancy in any other office, may be filled by the Board of Directors at a meeting where a quorum is present by vote of a majority of the directors present. Each successor as a director or officer shall hold office for the unexpired term and until his successor shall be elected or appointed and qualified, or until his earlier resignation, removal or death. The Board of Directors shall have and may exercise all its powers, notwithstanding the existence of one or more vacancies in its number as fixed pursuant to these By-Laws or by the stockholders.

ARTICLE XVI Certificates of Stock

Each stockholder shall be entitled to a certificate representing the capital stock of the Corporation owned by him, in such form as shall, in conformity with law, be prescribed from time to time by the Board of Directors. Each certificate shall be signed by the President or a Vice President and by either the Treasurer or an Assistant Treasurer, and may, but not need be, sealed

with the corporate seal. If any officer who has signed any such certificate shall have ceased to be such officer before such certificate is issued, the certificate may be issued by the Corporation with the same effect as if he were such officer at the time of issue.

Every certificate for shares of stock which are subject to any restrictions on transfer pursuant to the Articles of Organization, the By-Laws, or any agreement to which the Corporation is a party, shall have the restriction noted conspicuously on the certificate, and shall also set forth, on the face or back, a statement of the existence of such restriction and a statement that the Corporation will furnish a copy thereof to the holder of such certificate upon written request and without charge.

The Corporation shall have two classes of stock, namely voting non-equity stock and non-voting common stock. All terms of the Corporation's by-laws shall apply to each class of stock as if both were capital stock.

ARTICLE XVII

Transfer of Shares of Stock; Restrictions

Subject to the restrictions, if any, stated or not on the stock certificates, shares of stock may be transferred on the books of the Corporation only by surrender to the Corporation of the certificate therefor, properly endorsed or accompanied by a written assignment or power of attorney properly executed, with all requisite transfer stamps affixed, and with such proof of the authenticity and effectiveness of the signature as the Corporation shall reasonably require. Except as may be otherwise required by law, the Articles of Organization or these By-Laws, the Corporation shall have the right to treat the person registered on the stock transfer books as the owner of any shares of the Corporation's stock as the owner-in-fact thereof for all purposes, including the payment of dividends, liability for assessments, the right to vote with respect thereto, and otherwise, and accordingly shall not be bound to recognize any attempted transfer, pledge or other disposition thereof, or any equitable or other claim with respect thereto, whether or not it shall have actual or other notice thereof, until such shares shall have been transferred on the Corporation's books in accordance with these By-Laws. It shall be the duty of each stockholder to notify the Corporation of his post office address.

ARTICLE XVIII

Loss of Certificates

In the case of the alleged loss, destruction, or wrongful taking of a certificate of stock, a duplicate certificate may be issued in place thereof upon receipt by the Corporation of such evidence of loss and such indemnity bond, with or without surety, as shall be satisfactory to the President and Treasurer or otherwise upon such terms as the Board of Directors may prescribe consistent with law.

ARTICLE XIX

Indemnification of Directors and Officers

Each officer or director or former officer or director of the Corporation, and each person who shall at the Corporation's request have served as an officer or director of another corporation of

which the Corporation is or was a stockholder or creditor whether or not then in office, and the heirs, executors, administrators, and assigns of each of them shall be indemnified by the Corporation against all costs and expenses, including fees and disbursements of counsel, reasonably incurred by or imposed upon him or them in connection with or arising out of any action, suit, or proceeding, civil or criminal, in which he or they may be involved, or incurred in anticipation of any action, suit or proceeding, by reason of his being or having been an officer or director of the Corporation or of such other corporation, including the cost of reasonable settlements (other than amounts paid to the Corporation itself) made with a view to curtailment of costs of litigation. Without limiting the generality of the foregoing, no director of the Corporation shall be liable to any person on account of any action undertaken by him as such director in reliance in good faith upon the existence of any fact or circumstance reported or certified to the Board of Directors by any officer of the Corporation or by any independent auditor, engineer, or consultant retained or employed as such by the Board of Directors. The Corporation shall not, however, indemnify any such person, or his heirs, executors, administrators, or assigns, with respect to any matter as to which he shall be finally adjudged in any such action, suit, or proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation. The foregoing right of indemnification shall not be exclusive of other rights to which any such director or officer may be entitled as a matter of law.

ARTICLE XX

Seal

The seal of the Corporation shall, subject to alteration by the Board of Directors, consist of a flat-faced circular die with the word "Massachusetts", together with the name of the Corporation and the year of incorporation, cut or engraved thereon.

ARTICLE XXI

Execution of Papers

Except as the Board of Directors may generally or in a particular case otherwise authorize or direct, all deeds, leases, transfers, contracts, proposals, bonds, notes, checks, drafts or other obligations made, accepted or endorsed by the Corporation shall be signed or endorsed on behalf of the Corporation by either the President or Treasurer.

ARTICLE XXI

Fiscal Year

Except as from time to time provided by the Board of Directors, the fiscal year of the Corporation shall end at the close of business on the last day of December of each year.

ARTICLE XXIII
Voting Stock in Other Corporations

Unless otherwise authorized or directed by the Board of Directors, the President, or, in the case of his absence or failure to act, the Treasurer, shall have full power and authority on behalf of the Corporation to attend and to act and to vote at any meetings of stockholders of any corporation in which this Corporation may hold stock, and at any such meeting shall possess and may exercise any and all rights and powers incident to the ownership of such stock and which, as the owner thereof, the Corporation might have possessed and exercised if present. The Board of Directors, by resolution from time to time, or, in the absence thereof, the President, may confer in writing like powers upon any other person or persons as attorneys and proxies of the Corporation.

ARTICLE XXIV
Corporate Records

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

ARTICLE XXV
Amendments

These By-Laws may be amended or added to, altered or repealed in whole or in part by the stockholders, at any annual or special meeting of the stockholders, provided notice of the general purpose of the proposed amendment, addition, alteration or repeal is given in the notice of said meeting, or by the Board of Directors, at any meeting of the Board of Directors, except that the Board of Directors may not amend, add to, alter or repeal any provision hereof which by law, the Articles of Organization or these By-Laws requires action by the stockholders, nor may the Board of Directors take any action to amend Article XVIII of this Article XXIV. Any By-Law adopted by the directors may be amended or repealed by the stockholders.

CERTIFICATION OF BYLAWS

OF

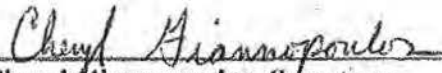
KAPNOS, INC.

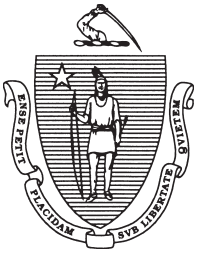
a Massachusetts Corporation

KNOW ALL BY THESE PRESENTS:

I, Cheryl Giannopoulos, certify that I am Secretary of Kapnos, Inc., a Massachusetts corporation (the "Company"), that I am duly authorized to make and deliver this certification, that the attached Bylaws are a true and correct copy of the Bylaws of the Company in effect as of the date of this certificate.

Dated: December 1, 2020


Cheryl Giannopoulos, Secretary



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

William Francis Galvin
Secretary of the
Commonwealth

Date: April 04, 2025

To Whom It May Concern :

I hereby certify that according to the records of this office,
KAPNOS, INC.

is a domestic corporation organized on **August 05, 2020** , 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: 25040009060

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

Processed by: hng



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

mass.gov/dor

Letter ID: L0029597792
Notice Date: May 15, 2025
Case ID: 0-002-875-718



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



KAPNOS INC
2 MERCHANT ST STE 3
SHARON MA 02067-1630



000037

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, KAPNOS 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, Monday through Friday, 9:00 a.m. to 4:00 p.m.

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Business Plan for Kapnos Inc.

License Type: Marijuana Retailer

Location: Sharon, Massachusetts

Anticipated Opening Date: December 2025

1. Executive Summary

Kapnos Inc. is a Massachusetts-based cannabis retailer focused on delivering high-quality, wellness-centered cannabis products in a safe and inviting retail environment. The company is committed to full regulatory compliance, local community engagement, and responsible adult-use cannabis sales. The Kapnos store is planned for Sharon, MA, with an anticipated launch in December 2025.

2. Ownership and Management

Kapnos Inc. is a multi-member corporation with the following principal owners:

- Lynne Striar
- Cheryl Giannopoulos
- Jignesh Pachani
- Shivam Patel
- Ralph R. Morin III
- Soozen Tribuna

None of the owners are participants in the Massachusetts Cannabis Control Commission's Social Equity or Economic Empowerment programs.

3. Mission and Vision

Kapnos Inc. seeks to redefine the cannabis retail experience through a wellness-focused approach. Our mission is to serve as a trusted resource for adult-use cannabis consumers who value education, health-conscious products, and responsible use. We aim to integrate cannabis into modern wellness culture through a calm, clean, and customer-first environment.

4. Host Community Engagement

Kapnos has executed a Host Community Agreement (HCA) with the Town of Sharon, meeting all requirements of 935 CMR 500.101(1)(a)(8). The Community Outreach Meeting was held on March 7, 2025, during which the company addressed community questions,

explained operational and safety plans, and demonstrated its commitment to being a good neighbor.

5. Facility Overview

The Kapnos retail location will be designed for both functionality and ambiance. Customers will experience a clean, modern space that promotes education and wellness. The store will feature:

- Discreet entrance and calming interior design
- Educational materials and staff assistance for new consumers
- ADA-compliant layout and technology-enabled service
- Sustainable materials where possible

6. Operations Plan

Kapnos Inc. will operate in accordance with all applicable regulations under 935 CMR 500.000. Products will be sourced from licensed Massachusetts cultivators and product manufacturers. All cannabis inventory will be tracked through the state's seed-to-sale system. Customers must be 21+ and present valid government-issued identification to enter the premises.

Store hours will comply with municipal regulations and CCC standards. Operational SOPs will include:

- Customer verification procedures
- Staff training in safe sales practices
- Health and safety protocols
- Waste management and product disposal procedures

7. Staffing Plan

Kapnos Inc. plans to hire 6–10 employees, including:

- Store Manager
- Assistant Manager
- Budtenders
- Inventory Coordinator
- Security Personnel

The company will prioritize hiring locally and fostering a diverse and inclusive workplace. All employees will complete pre-employment background checks and undergo comprehensive training on compliance, customer service, and cannabis product knowledge.

8. Timeline

Milestone	Target Date
Submit Application to Commission	April 2025
Commission Awards Provisional License	July 2025
Apply for and Obtain Local Permitting	August 2025
Complete Construction	September 2025
Sharon Awards Certificate of Occupancy	September 2025
Submit Post Provisional License Inspection (PPLI)	September 2025
Commission Awards Final License	November 2025
Metrc, Agent Onboarding, Obtain Product	November 2025
Submit Post Final License Inspection (PFLI)	November 2025
Begin Sales	December 2025

9. Financial Plan – Basic Budget (Year 1)

Category	Estimated Cost (Year 1)
Rent / Lease	\$25,000
Build-Out / Renovation	\$250,000
Licensing & Legal	\$50,000
Inventory	\$200,000
Salaries & Benefits	\$400,000
Security Systems	\$75,000
Marketing & Branding	\$50,000
Insurance	\$30,000
Technology (POS, Software)	\$25,000
Miscellaneous / Reserves	\$50,000

Total Estimated Budget

\$1.155 million



KAPNLLC-01

BMCDONOUGH

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

8/7/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Corcoran & Havlin Insurance Group 287 Linden Street Wellesley, MA 02482	CONTACT NAME: Beth F McDonough, CIC PHONE (A/C, No, Ext): (781) 235-3100 280 FAX (A/C, No): (781) 235-1622 E-MAIL ADDRESS: Beth.McDonough@chinsurance.com
INSURER(S) AFFORDING COVERAGE	
INSURED	NAIC #
Kapnos Inc dba Kapnos Cannabis Co 2-4 Merchant Street Suite #4 Sharon, MA 02067	INSURER A : Sutton Specialty Insurance Company 16848 INSURER B : MA Retail Merchants WC Group Inc. INSURER C : INSURER D : INSURER E : INSURER F :

COVERAGES**CERTIFICATE NUMBER:****REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			SSC-00001279-02	2/28/2025	2/28/2026	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 500,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ Excluded NO DEDUCTIBLE \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / <input checked="" type="checkbox"/> N If yes, describe under DESCRIPTION OF OPERATIONS below		N / A	014005036165125	1/1/2025	1/1/2026	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	Products			SSC-00001278-02	2/28/2025	2/28/2026	Limit \$ 1,000,000
A	Products			SSC-00001278-02	2/28/2025	2/28/2026	Retention/Deductible \$ 2,500

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
 Coverage for General Liability does not have a deductible, coverage for Products Liability contains a \$2,500 Deductible.*
 Re: For operations located at 2-4 Merchant Street Suite #4, Sharon, MA 02067

CERTIFICATE HOLDER**CANCELLATION**

Cannabis Control Commission Union Station, 2 Washington Sq Worcester, MA 01604	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE
---	---

From: Beth McDonough
Sent: Mon, 4 Aug 2025 18:31:14 +0000
Subject: RE: [EXTERNAL] Re: Update Insurance Certificate to Show Deductible of Not Over 5k
Attachments: 25 26 COI CCC.pdf

Hi Brian,

The CCC certificate is enclosed.

Take care,
Beth

From: Brian Striar <brianstriar@gmail.com>
Sent: Monday, August 4, 2025 2:19 PM
To: Beth McDonough <beth.mcdonough@chinsurance.com>
Cc: Thomas Tweed <tweedt10@gmail.com>; Valerio Romano <valerio@vgrlawfirm.com>
Subject: Re: [EXTERNAL] Re: Update Insurance Certificate to Show Deductible of Not Over 5k

Hey Beth! This is for the CCC as well, we're applying for a dispensary license in some of our existing space. Thank you for your help!
Sent from my iPhone

On Aug 4, 2025, at 1:38 PM, Beth McDonough
<beth.mcdonough@chinsurance.com> wrote:

Hi Brian,

Sure can. The subject line states you're looking for an updated certificate. Who needs the certificate? The last one I sent to you was for the CCC and that had the Products \$2500 deductible shown.

Best,
Beth

From: Brian Striar <brianstriar@gmail.com>
Sent: Monday, August 4, 2025 8:52 AM
To: Beth McDonough <beth.mcdonough@chinsurance.com>
Cc: Thomas Tweed <tweedt10@gmail.com>; Valerio Romano <valerio@vgrlawfirm.com>
Subject: [EXTERNAL] Re: Update Insurance Certificate to Show Deductible of Not Over 5k

Good morning Beth, I hope you had a great weekend! Looping you in for some help, please see Valerio's request.
Thank you!

Brian Striar, Co Founder/Chief Operations Officer
Kapnos Cannabis Co.
2 Merchant Street Suite #4
Sharon, MA 02067
781-264-1233

On Thu, Jul 31, 2025 at 12:50 PM Valerio Romano
<valerio@vgrlawfirm.com> wrote:

If the Retention of \$2,500 is the deductible, please have the insurance company indicate that. They aren't always the same. Attached is what we submitted. Also creating a task.

--

Valerio Romano

VGR Law Firm LLC

15 Brook St., Suite 1

Cohasset, MA 02025

(617) 865-3959

valerio@vgrlawfirm.com

<https://www.vgrlawfirm.com/>

<https://www.linkedin.com/in/valerioromano/>

[EMAIL DISCLAIMER](#)

Please note that an email request to bind or alter coverage is not a guarantee of binding or alteration. Coverage is only considered bound or altered upon receiving confirmation from Cross Insurance that the requested change has been made. This electronic message transmission contains information from Cross Insurance that may be confidential and/or privileged. The information is intended for the use of the individual or entity named

above. If you are not the intended recipient, please note that any disclosure, copying, distribution, or use of the contents or attachments in this message is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be considered a waiver of any privilege or protection. If you have received this electronic transmission in error, please delete it and notify the sender by email or telephone immediately. Although this e-mail and any attachments are believed to be free of any virus or other defects, it is the responsibility of the recipient to ensure that it is virus-free and no responsibility is accepted by the sender for any loss or damage arising if such a virus or defect exists.

ENERGY COMPLIANCE PLAN

Overview

Although this Policy is for a dispensing only establishment, Kapnos performs the following as part of the implementation of this Policy:

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

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

Energy Efficiency and Conservation

Kapnos has considered opportunities for renewable energy generation. Our team is dedicated to consistently striving for sustainability and emissions reduction. Although Kapnos is currently a retail only facility, and its energy usage does not exceed that of any other retail facility in the Commonwealth, throughout construction of our facility we will endeavor to utilize energy efficient lighting, low flow plumbing fixtures, and other energy efficient options when available.

MAINTAINING OF FINANCIAL RECORDS

Kapnos's operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana Regulations. Financial records maintenance measures include policies and procedures requiring that confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

Business & Sales Records

All recordkeeping requirements under 935 CMR 500.105(9) are followed, including keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:

1. Assets and liabilities
2. Monetary transactions
3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers
4. Sales records including the quantity, form, and cost of marijuana products
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit or item of value paid to any persons having direct or indirect control over Kapnos

All sales recording requirements under 935 CMR 500.140(5) are followed, including:

1. Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the Department of Revenue (DOR), and a sales recording module approved by DOR
2. Prohibiting the use of software or other methods to manipulate or alter sales data
3. Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed

If Kapnos 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, it shall:

1. Immediately disclose the information to the Commission
2. Cooperate with the Commission in any investigation regarding manipulation or alteration of sales data
3. Take such other action directed by the Commission to comply with 935 CMR 500.105

Kapnos will comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements. Operator has adopted separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales. Operator shall maintain records that will allow the Commission and the DOR to audit and examine the point-of-sale system used to ensure compliance with Massachusetts tax laws and 935 CMR 500.

Additional written business records will be kept, including, but not limited to, records of:

1. Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16)
2. Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations
3. Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations

Once additional guidance on this aspect of license renewal records is provided by the Cannabis Control Commission, Operator shall comply with that guidance.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Kapnos securely maintains personnel records, including registration status and background check records. Kapnos keeps, at a minimum, the following 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 marijuana establishment agent
3. A staffing plan that demonstrates accessible business hours
4. Personnel policies and procedures
5. All background check reports obtained in accordance with 935 CMR 500.030

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with Kapnos and will include, at a minimum, the following:

1. All materials submitted to the Commission pursuant to 935 CMR 500.030(2)
2. Documentation of verification of references
3. The job description or employment contract that includes duties, authority, responsibilities, qualifications and supervision
4. 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
5. Documentation of periodic performance evaluations
6. A record of any disciplinary action taken
7. Notice of completed responsible vendor and eight-hour related duty training
8. Results of initial background investigation, including CORI reports

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent's manager or members of the executive management team.

After-Hours Contact Information

Thomas Tweed, Manager, 720-240-1875

Business Hours (Subject to Amendment by the Zoning Board of Appeals)

Monday - Sunday: 9AM – 10PM

Agent Background Checks

In addition to completing the Commission's agent registration process, all agents hired to work for Kapnos will undergo a detailed background investigation prior to being granted access to a Kapnos facility or beginning work duties.

Background checks will be conducted on all agents in their capacity as employees or volunteers for Kapnos pursuant to 935 CMR 500.030 and used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Kapnos will consider:

1. All conditions, offenses and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction;
2. All criminal disqualifying conditions, offenses and violations include the crimes of attempt, accessory, conspiracy, and solicitation (juvenile dispositions will not be considered as a factor for determining suitability); and
3. Where applicable, all look-back periods for criminal conditions, offenses and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.

Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Kapnos:

1. Complies with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination
2. Considers whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802

In the event a Presumptive Negative Suitability Determination is made, Kapnos will consider the following factors:

1. Time since the offense or incident
2. Age of the subject at the time of the offense or incident
3. Nature and specific circumstances of the offense or incident
4. Sentence imposed and length
5. Penalty or discipline imposed, including damages awarded, if civil or administration
6. Relationship of offense or incident to nature of work to be performed
7. Number of offenses or incidents
8. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered
9. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained
10. Any other relevant information, including information submitted by the subject

Operator will additionally consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process

in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.

Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.

References provided by the agent will be verified at the time of hire.

As a condition of their continued employment, agents, volunteers, contractors and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Kapnos or the Commission.

Personnel Policies and Training

As outlined in Kapnos's Record Keeping Procedures, a staffing plan and staffing records are maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Kapnos agents are required to complete training as detailed in Kapnos's Qualifications and Training Plan which includes but is not limited to Kapnos's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

Kapnos has a policy for the immediate dismissal of any dispensary agent who has:

1. Diverted marijuana, which will be reported the Police Department and to the Commission;
2. Engaged in unsafe practices with regard to Kapnos's operations, which will be reported to the Commission; or
3. 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.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

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

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

Pursuant to 935 CMR 500.105(4), Kapnos will not engage in any marketing, advertising, or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21. Kapnos will not engage in any advertising, marketing, and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard, or other outdoor advertising, including sponsorship of charitable, sporting, or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. Kapnos will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising, and branding materials for public viewing will include a warning stating, "**For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.**" Pursuant to 935 CMR 500.105(6)(b), Kapnos packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors. Kapnos' website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

QUALIFICATIONS AND TRAINING

Kapnos ensures that all employees hired to work at a Kapnos facility are qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Kapnos's agents successfully complete a comprehensive training program tailored to the roles and responsibilities of the agent's job function. Agent training includes at least the Responsible Vendor Training Program and eight (8) hours of on-going training annually.

All of Kapnos's current owners, managers and employees that are involved in the handling and sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of three (3) hours of required training to marijuana establishment agents to be designated a Responsible Vendor. All new employees involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program within 90 days of the date they are hired. After initial successful completion of a Response Vendor Training Program, each owner, manager and employee involved in the handling and sale of marijuana will successfully complete the program once every year thereafter to maintain designation as a Responsible Vendor.

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

As part of the Responsible Vendor Training Program, Kapnos's agents receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including:
 - a. Scientifically-based evidence on the physical and mental health effects based on the type of Marijuana Product
 - b. The amount of time to feel impairment
 - c. Visible signs of impairment
 - d. Recognizing signs of impairment
2. Diversion prevention and prevention of sales to minors, including best practices
3. Compliance with all tracking requirements
4. Acceptable forms of identification, including:
 - a. How to check identification
 - b. Spotting false identification
 - c. Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission
 - d. Common mistakes made in verification
5. Other key state laws and rules affecting owners, managers, and employees, including:
 - a. Local and state licensing and enforcement
 - b. Incident and notification requirements
 - c. Administrative and criminal liability
 - d. License sanctions
 - e. Waste disposal
 - f. Health and safety standards
 - g. Patrons prohibited from bringing marijuana onto licensed premises
 - h. Permitted hours of sale
 - i. Conduct of establishment
 - j. Permitting inspections by state and local licensing and enforcement authorities
 - k. Licensee responsibilities for activities occurring within licensed premises
 - l. Maintenance of records
 - m. Privacy issues
 - n. Prohibited purchases and practice

QUALITY CONTROL AND TESTING

Sanitary Requirements

Any Kapnos agent whose job includes contact with marijuana or nonedible marijuana products, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.

Any Kapnos agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:

1. Maintaining adequate personal cleanliness
2. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated

Kapnos's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be in Kapnos' production areas and where good sanitary practices require employees to wash and sanitize their hands and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.

Kapnos's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Kapnos will ensure that litter and waste is properly removed and disposed of to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12).

Kapnos's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair.

Kapnos's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned.

Kapnos's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition.

Kapnos will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be 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. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable.

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

of marijuana products. Kapnos acknowledges and understands that the Commission may require Kapnos to demonstrate the intended and actual use of any toxic items found on Kapnos's premises.

Kapnos will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Kapnos's needs.

Kapnos's plumbing will be of adequate size and design, and adequately installed and maintained to carry enough water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines.

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

Kapnos will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and 15. Kapnos will store, and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

Kapnos's vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Kapnos will ensure that Kapnos's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

Kapnos will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Kapnos to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Testing

Kapnos will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Kapnos will purchase products from wholesale partners where a passing certificate of analysis will be provided by the wholesaler.

Should Kapnos test any marijuana or marijuana products itself, any Independent Testing Laboratory relied upon by Kapnos for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of Kapnos's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana infused Products*. Testing of Kapnos's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Kapnos's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant growth regulators, and the presence of pesticides. Kapnos acknowledges and understands that the Commission may require additional testing.

Kapnos's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Kapnos and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Kapnos will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. Kapnos acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Kapnos's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Kapnos for disposal

or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%). Any marijuana or marijuana products 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.

RECORDKEEPING PROCEDURES

Kapnos has established policies regarding recordkeeping and record-retention to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Kapnos's documents. Records will be stored at Kapnos in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Overview

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

Corporate Records

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates and renewals, including:

1. Insurance Coverage:
 - a. Directors & Officers Policy
 - b. Product Liability Policy
 - c. General Liability Policy
 - d. Umbrella Policy
 - e. Workers Compensation Policy
 - f. Employer Professional Liability Policy
2. Third-Party Laboratory Contracts
3. Commission Requirements:
 - a. Annual Agent Registration
 - b. Annual Marijuana Establishment Registration
4. Local Compliance:
 - a. Certificate of Occupancy
 - b. Special Permits
 - c. Variances
 - d. Site Plan Approvals
 - e. As-Built Drawings
 - f. Host Community Agreements
5. Corporate Governance:
 - a. Annual Report
 - b. Secretary of Commonwealth Filings

Business Records

Business Records require ongoing maintenance and updates. These records may be electronic or hard copy (preferably electronic) and at a minimum include:

1. Assets and liabilities

2. Monetary transactions
3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices and vouchers
4. Sales records including the quantity, form and cost of marijuana products
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Kapnos

Personnel Records

At a minimum, Personnel Records include:

1. Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions.
2. A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Kapnos and will 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. Records of any disciplinary actions
 - 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
5. All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI)

Handling and Testing of Marijuana Records

Kapnos maintains the results of all testing for a minimum of one (1) year.

Inventory Records

The record of each inventory includes, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures and titles of the agents who conducted the inventory.

Seed-to-Sale Tracking Records

Kapnos uses Metrc, and a commission approved seed-to-sale tracking software to maintain real-time inventory. Kapnos recognizes that the Commission relies on Metrc to audit inventory, and as such will ensure that Metrc data is always accurate. The seed-to-sale tracking software inventory reporting meets the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of: marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana

ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

Sales Records for Marijuana Retailer

Kapnos maintains records that it has performed a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate the sales data and produce such records on request to the Commission.

Incident Reporting Records

Within ten (10) calendar days, Kapnos will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Kapnos for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Kapnos's jurisdiction on request.

Visitor Records

A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

Waste Disposal Records

When marijuana or marijuana products are disposed of, Kapnos will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Kapnos agents present during the disposal or other handling, with their signatures. Kapnos will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Security Records

A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.

Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.

Recordings shall not be destroyed or altered and shall be retained as long as necessary if Kapnos is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

Transportation Records

Kapnos will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.

Vehicle Records (as applicable)

Records that any and all of Kapnos's vehicles, should it seek approval for transportation, are properly registered, inspected and insured in the Commonwealth and shall be made available to the Commission on request.

Agent Training Records

Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time and place he or she received the training, the topics discussed and the name and title of the presenter(s).

Responsible Vendor Training

Kapnos shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

Closure

In the event Kapnos closes, all records will be kept for at least two (2) years at Kapnos's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Kapnos will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

Written Operating Policies and Procedures

Policies and Procedures related to Kapnos's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures include the following:

1. Security measures in compliance with 935 CMR 500.110
2. Employee security policies, including personal safety and crime prevention techniques
3. A description of Kapnos's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000
4. Storage of marijuana in compliance with 935 CMR 500.105(11)
5. 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
6. Price list for Marijuana and Marijuana Products
7. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9)
8. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160
9. A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d)

10. Alcohol, smoke, and drug-free workplace policies
11. A plan describing how confidential information will be maintained
12. Policy for the immediate dismissal of any dispensary agent who has:
 - a. Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission
 - b. Engaged in unsafe practices with regard to Kapnos's operations, which will be reported to the Commission
 - c. Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial or Native American tribal authority
13. A list of all members and executives of Kapnos is available upon request by any individual. This requirement may be fulfilled by placing this information on Kapnos's website
14. Policies and procedures for the handling of cash on Kapnos premises including but not limited to storage, collection frequency and transport to financial institution(s)
15. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old
16. Policies and procedures for energy efficiency and conservation that will include:
 - a. 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
 - b. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable
 - c. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage)
 - d. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants
17. Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

[License Renewal Records](#)

Kapnos shall submit with its renewal application a compliant and operative Host Community Agreement between Kapnos and Sharon, and any other information required by the Commission.

[Record Retention](#)

Kapnos will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

DIVERSITY PLAN

Overview

Kapnos Inc. (“Kapnos”) is committed to fostering a diverse, inclusive, and equitable work environment. We recognize that cannabis prohibition disproportionately impacted certain communities and are dedicated to creating economic opportunity for historically marginalized populations — including minorities, women, veterans, people with disabilities, and LGBTQ+ individuals — in our hiring, career development, and supplier relationships.

This Diversity Plan outlines the specific goals, strategies, and evaluation metrics Kapnos Inc. will use to promote diversity across all levels of the organization.

Goals

1. **Workforce Diversity:** Ensure that at least 50% of employees identify as minorities, women, veterans, people with disabilities, or LGBTQ+ individuals. Of that 50%, the breakdown sought by Kapnos will be:
 - a. At least 25% will be minorities;
 - b. At least 50% will be women;
 - c. At least 10% will be veterans;
 - d. At least 10% will be people with disabilities; and
 - e. At least 10% staff will be LGBTQ+.
2. **Supplier Diversity:** Engage with minority-, women-, and veteran-owned vendors where possible, particularly for ancillary services such as marketing, construction, security, and cleaning. In order to achieve this goal, Kapnos will seek information as to which suppliers are diverse at networking events and through public information available about potential suppliers. Kapnos will seek that its vendors be:
 - a. At least 25% minorities;
 - b. At least 50% women;
 - c. At least 10% veterans;
 - d. At least 10% people with disabilities; and
 - e. At least 10% be LGBTQ+.

Strategies

1. **Recruitment & Hiring**
 - a. Partner with local organizations that serve underrepresented populations when possible.

- b. Include Equal Opportunity Employer (EOE) language in all job postings when needed.
 - c. To satisfy the Commission's request, if hiring is needed, such job postings will be made quarterly until required staffing is fulfilled.
 - d. To satisfy the Commission's request, Kapnos will post on Indeed.
 - e. To satisfy the Commission's request, Kapnos uses Ellen Brown of Greenpath Training, a woman owned RVT trainer.
2. Retention & Advancement: Provide bias-free onboarding and training programs that foster an inclusive workplace.
3. Supplier Inclusion
 - a. Maintain a database of certified minority-, women-, and veteran-owned businesses.
 - b. Prioritize diverse vendors in procurement decisions when quality and cost are comparable.

Metrics and Evaluation

1. Maintain and annually review demographic data on hires, promotions, and vendor contracts.
2. Conduct annual reviews of diversity goals and update hiring and outreach strategies accordingly.
3. Report outcomes as required to the Cannabis Control Commission.

Accountability

The Ownership Team will be responsible for implementing and monitoring this Diversity Plan. A designated team member will track progress, gather feedback, and lead necessary updates to the strategy on an annual basis.

Regulatory Statement

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

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

Conclusion

Kapnos Inc. recognizes that a diverse workforce is not only a legal and ethical imperative, but a business strength. We are fully committed to building a culture of equity and inclusion as part of our core identity and operational success.