



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC283125  
Original Issued Date: 07/01/2023  
Issued Date: 07/01/2023  
Expiration Date: 07/01/2024

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Lowkey Cultivation LLC

Phone Number: 617-894-2266 Email Address: jeff@lowkeydispensary.com

Business Address 1: 1601 Blue Hill Avenue

Business Address 2: Suite 201

Business City: Boston

Business State: MA

Business Zip Code: 02126

Mailing Address 1: 1601 Blue Hill Avenue

Mailing Address 2: Suite 201

Mailing City: Boston

Mailing State: MA

Mailing Zip Code: 02126

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

### PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: Economic Empowerment Priority

Economic Empowerment Applicant Certification Number: EE202286

RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status: Obtained Final Certificate of Registration, but is not open for business in Massachusetts

To your knowledge, is the existing RMD certificate of registration in good standing?: no

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

#### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control:

100

Role: Owner / Partner

Other Role:

First Name: Jeff

Last Name: Similien

Suffix:

Gender: Male

User Defined Gender:

Date generated: 08/02/2023

Page: 1 of 5

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

Specify Race or Ethnicity:

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Jeff

Last Name: Similien

Suffix:

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$100000

Percentage of Initial Capital: 100

Capital Attestation: Yes

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Jeff

Last Name: Similien

Suffix:

Marijuana Establishment Name: Lowkey Dispensary

Business Type: Marijuana Retailer

Marijuana Establishment City: Boston

Marijuana Establishment State: MA

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 54 Walter St

Establishment Address 2:

Establishment City: Boston

Establishment Zip Code: 02136

Approximate square footage of the Establishment: 24000

How many abutters does this property have?: 1

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

Cultivation Tier:

Cultivation Environment:

#### FEE QUESTIONS

Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft. Cultivation Environment: Indoor

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Certification Form.pdf	pdf	60895f4f68436d078d6b0a3f	04/28/2021
Plan to Remain Compliant with Local Zoning	Lowkey Cultivation - Plan to Remain Compliant.pdf	pdf	63313e3676c66600080ed0d5	09/26/2022
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	63313f062bb6940008522460	09/26/2022

Community Outreach Meeting Documentation	Attachment C.jpg	jpeg	6331410f76c66600080ed1de	09/26/2022
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	633141f52bb69400085225b2	09/26/2022
Community Outreach Meeting Documentation	Lowkey - Cultivation Attestation copy (1).pdf	pdf	6336cfc776c66600081515f6	09/30/2022
Certification of Host Community Agreement	Lowkey Cultivation HCA Cert.pdf	pdf	6336cfd32bb6940008587c77	09/30/2022

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Lowkey Cultivation Positive Impact Plan-2ndFinal.pdf	pdf	635e0c2dbd58f900087351c1	10/30/2022

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role: CEO  
First Name: Jeff Last Name: Similien Suffix:  
RMD Association: Not associated with an RMD  
Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	LOWKEY CULTIVATION LLC Operating Agreement.pdf	pdf	631f5d7fd239e20007f213ab	09/12/2022
Secretary of Commonwealth - Certificate of Good Standing	Lowkey Cultivation Cert of Good Standing Commonwealth- 9-2022.pdf	pdf	631f64b5d239e20007f22e8e	09/12/2022
DUA attestation if no employees	Employee Attestations - Lowkey Cultivation - 9-2022 Docs_1-1.pdf	pdf	632222b444fa35000aeebbc7	09/14/2022
Department of Revenue - Certificate of Good standing	Certificate of Good Standing Lowkey Cultivation.pdf	pdf	6336d51276c6660008151cdd	09/30/2022

No documents uploaded

Massachusetts Business Identification Number: 001548066

Doing-Business-As Name: Lowkey Cultivation

**BUSINESS PLAN**

## Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Lowkey Cultivation Close Associates-8-2022 (1).pdf	pdf	631f699a44fa35000aeb274b	09/12/2022
Plan for Liability Insurance	Letter_of_Intent_to_Bind_Coverage_-_Lowkey_Cultivation_LLC_(Cultivation).pdf	pdf	6322200444fa35000aeb4a3	09/14/2022
Business Plan	LOWKEY Cultivation docx-Biz plan (1).pdf	pdf	63314c372bb6940008522726	09/26/2022
Proposed Timeline	Lowkey Cultivation Timeline.pdf	pdf	6336d5512bb694000858830e	09/30/2022

**OPERATING POLICIES AND PROCEDURES**

## Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Storage of marijuana	Lowkey Cultivation - Operations - Storage and Handling SOP - September 2022 (1).pdf	pdf	6336d8902bb6940008588725	09/30/2022
Prevention of diversion	Lowkey Cultivation SOP Anti-Diversion Policy-September 2022.pdf	pdf	6339d72b2bb69400085a6daf	10/02/2022
Maintaining of financial records	Lowkey Cultivation Financial Records Maintenance SOP.pdf	pdf	6339dd322bb69400085a6ff1	10/02/2022
Restricting Access to age 21 and older	Lowkey Cultivation 21+ Policy- September 2022.pdf	pdf	6339e6c02bb69400085a71d3	10/02/2022
Qualifications and training	Lowkey Cultivation Qualifications and Intended Trainings for Agents - September 2022.pdf	pdf	6339f00176c66600081700df	10/02/2022
Record Keeping procedures	Lowkey Cultivation - Record-Keeping SOP-September 2022.pdf	pdf	633a56322bb69400085a919a	10/02/2022
Quality control and testing	Lowkey Cultivation Quality Control and Testing Procedures SOP-September 2022.pdf	pdf	633a68c176c6660008172307	10/03/2022
Personnel policies including background checks	Lowkey Cultivation Personnel Policies SOP - September 2022.docx.pdf	pdf	633acf7976c66600081735ee	10/03/2022
Transportation of marijuana	Lowkey Cultivation Transportation SOP - September 2022.pdf	pdf	633ad3c72bb69400085aaf43	10/03/2022
Energy Compliance Plan	Lowkey Cultivation Energy Compliance Plan - October 2022.pdf	pdf	635f5cb8bd58f900087398d5	10/31/2022
Inventory procedures	Lowkey Cultivation Inventory SOP-Updated-October-2022.pdf	pdf	635fe2d3bd58f9000873f8e2	10/31/2022
Security plan	Lowkey Cultivation Security Plan SOP-Updated-November-2022.pdf	pdf	637f22a3a0fd020008c5b308	11/24/2022
Security plan	Lowkey Cultivation Security Plan SOP-Updated-December-2022.pdf	pdf	63848922a0fd020008c70e06	11/28/2022
Policies and Procedures for cultivating.	Lowkey Cultivation -Cultivation Procedures - Update-December-2022-3rd-Vers.pdf	pdf	63a25f9952253500084f5e70	12/20/2022



#### ATTESTATIONS

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

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

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

Notification:

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 9:00 PM
Tuesday From: 8:00 AM	Tuesday To: 9:00 PM
Wednesday From: 8:00 AM	Wednesday To: 9:00 PM
Thursday From: 8:00 AM	Thursday To: 9:00 PM
Friday From: 8:00 AM	Friday To: 9:00 PM
Saturday From: 8:00 AM	Saturday To: 9:00 PM
Sunday From: 8:00 AM	Sunday To: 9:00 PM

# Host Community Agreement Certification Form

## Instructions

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

## Certification

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

1. Name of applicant:

2. Name of applicant’s authorized representative:

3. Signature of applicant’s authorized representative:

4. Name of municipality:

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



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



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

8. Host community agreement execution date:





## **Plan to Remain Compliant with Local Zoning**

### **Marijuana Establishment**

#### **Purpose:**

The purpose of this plan is to outline how Lowkey Cultivation LLC will remain in compliance and ensure that the Marijuana Establishment is and will remain compliant with local codes, ordinances and bylaws for the physical address of our Marijuana Establishment at 54 Walter Street, Hyde Park, Massachusetts 02136 which includes, but is not be limited to, the identification of any local licensing requirements for marijuana cultivation.

#### **Background:**

The city Of Boston enacted a Zoning Bylaw that established zoning restrictions for Marijuana Establishments. A marijuana establishment shall only be allowed by special permit from the Planning Board in accordance with MGL c. 40A, §9, and these Zoning Bylaws, including Articles 8 and 69 of the city's zoning code are subject to the following regulations, requirements and conditions.

Article 69, of the city of Boston's bylaws regarding the neighborhood of Hyde Park allow for cannabis establishments with a special permit issued by Special Permit by the Planning Board. Article 2, section 2-1 defines a cannabis establishment as "an entity, licensed and registered with the Commonwealth of Massachusetts that acquires, cultivates, possesses (including development of related products as edible marijuana infused products (MIP), tinctures, aerosols, oils, or ointments), transfers, transports, sells, distributes, dispenses, or administers cannabis, products containing cannabis, including, but not limited to an adult use cannabis establishment, a medical use cannabis establishment, a marijuana retailer, a marijuana product manufacturer or a marijuana cultivator. Cannabis Establishments shall include any Marijuana Establishment or Medical Marijuana Treatment Center licensed pursuant to 935 CMR 500, 105 CMR 725.100, or any successor regulation." (Text Amd. No. 432 , § 1, 4-13-2018)

Our location 54 Walter Street, Hyde Mark, MA 02136 is compliant with all other requirements

Our location 54 Walter Street, Hyde Mark, MA 02136 is compliant with all other requirements outlined in the Bylaw. Lowkey Cultivation LLC has also executed a Host Community Agreement with the city of Boston and received its Special Permit.

#### **Plan:**

Lowkey Cultivation LLC is currently and fully compliant with the requirements outlined



in the Bylaw and Special Permit. It is the intention of Lowkey Cultivation LLC to remain compliant with all relevant local codes, and Bylaws applicable to a Marijuana Establishment.

In addition to Lowkey Cultivation LLC remaining compliant with the existing Boston Zoning Bylaw, our executive management team and General Counsel will continually engage with the city of Boston to remain up to date with local codes zoning ordinances and by-laws, to remain fully compliant.

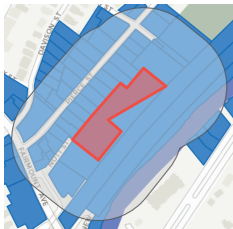
## Notice of Public Meeting :

Notice is hereby given that a Community Meeting for a Proposed Cannabis Establishment is scheduled for:

**Application Name:** Lowkey Cultivation, LLC

**Application Address:** 48-54 Walter Street, Hyde Park MA 02136

**License Type:** Cultivation Use



**Join virtually at the WebEx Event link below - this is NOT an in person meeting:**

**Proposal:** Change of occupancy from warehouse to Marijuana Establishment. Cannabis Establishment to be operated at the address of 48-54 Walter Street - the scheduled date for the meeting will be on April 19th, 2022 at 6:30 PM via the Webex Meeting Forum.

**Date:** Tuesday, April 19, 2022

**Time:** 6:30PM

**Event Link:** <https://bit.ly/3oMQcvF>

**Event password:** Lowkey

**Dial-in Number:** +1-408-418-9388

**Access Code:** 2340 596 6944

There will be an opportunity for the public to raise comments, questions, and concerns.

**If you any questions or comments about this proposal, please contact:**

Jeff Similien | Owner/ CEO of Lowkey Cultivation Dispensary | (617) 894-2266 | [jeff@lowkeydispensary.com](mailto:jeff@lowkeydispensary.com) or  
Denyel Fonseca | Hyde Park Liaison for Mayor's Office of Neighborhood Services | (617) 635-4830 |  
[denyel.fonseca@boston.gov](mailto:denyel.fonseca@boston.gov)

*Please note, the City does not represent the owner(s)/developer(s)/attorney(s)/applicant(s). The purpose of this meeting is to get community input and listen to the resident's positions on this proposal. This flier has been dropped off by the proponents per the city's request.*





24068

# Certificate of Bulk Mailing — Domestic

## Fee for Certificate

Up to 1,000 pieces (1 certificate for total number)

For each additional 1,000 pieces, or fraction thereof

Use Current Price List (Notice 123)

Duplicate Copy ☐

Number of Identical Weight Pieces	Class of Mail	Postage for Each Mailpiece Paid	Number of Pieces to the Pound
80	First Class	<input type="checkbox"/> Verified	
Total Number of Pounds	Total Postage Paid for Mailpieces	Fee Paid	
2		9.35	

Mailed For

LOWKEY LLC

Mailed By

MORRIS MATHIAS

## Postmaster's Certification

It is hereby certified that the number of mailpieces presented and the associated postage and fee were verified. This certificate does not provide evidence that a piece was mailed to a particular address.

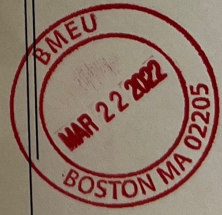
(Postmaster or Designee)

PS Form 3606-D, January 2016 PSN 7530-17-000-5548

Postage: Mailers must affix meter, PC Postage®, or (uncanceled) postage stamps here in payment of total fee due.

Acceptance employee must cancel postage affixed (by round-date) at the time of mailing.

If payment of total fee due is being paid by Permit Imprint, include the PostalOne® Transaction Number here: \_\_\_\_\_



See Reverse for Instructions



# The Hyde Park Bulletin

Volume 21, Issue 12

March 24, 2022



An aerial of the existing Arborway Yard in Jamaica Plain, which will be going electric in the coming years.  
COURTESY PHOTO

## Arborway bus garage discussed at SNA

Richard Heath  
Staff Reporter

Scott Hamwey and Alexandra Markiewicz of the MBTA are jointly coordinating the design and construction of the all-electric bus garage planned for the Arborway Yard in Jamaica Plain, and they made their first neighborhood presentation at the March 14 Stonybrook Neighborhood Association (SNA) virtual meeting.

Hamwey is director of bus modernization and Markiewicz, who lives in the Woodbourne neighborhood, is the project manager for the new garage.

As The Bulletin reported, their first public presentation was held on Dec. 9, 2021. Stonybrook will be the most affected neighborhood and at that meeting Hamwey said he would be meeting with SNA early in the new year.

Hamwey told the SNA that the Arborway bus garage is part of a much bigger program to electrify the entire 1,150-bus fleet in the next five years.

He said the first all electric bus garage began construction at Quincy in February 2022. As reported by the Quincy Sun, on Feb. 16 the new garage will be built for 120 battery-powered buses as part of a five-year, \$100-million a year MBTA investment in converting all of its buses from compressed natural gas to electricity.



How electric buses would be recharged at the new facility.  
COURTESY PHOTO

Now that Quincy is under construction, Hamwey said the new priority is the Arborway bus garage.

As Hamwey told callers in December, the schedule is tight since the CNG bus fleet will end its working life in 2028-2029.

Markiewicz said that the bus garage is targeted to begin construction in 2024 and completed at the end of 2027.

The Arborway garage has not been budgeted and funding is dependent on state and federal sources, but the Sun reported that the MBTA is looking at the \$1.2 trillion Bipartisan Infrastructure Bill signed in November 2021 as a source of funding for the nine new electric bus garages.

Markiewicz opened her presentation by saying “this will be a fully indoor operation.

“The MBTA identified the Arborway on April 26, 2021 as the next priority after Quincy due to the number of bus routes

and the high ridership on those routes.

“All the existing bus lines will remain at the Arborway and will start there,” she said. “Bus number 22 and 28 will be added [to the terminal at Forest Hills]. The 3600 Washington St. parcel now has 118 CNG buses and now will hold 200 BEB (battery electric buses) buses.”

The garage will take up the existing 500 Arborway building that is currently used for archives and materials and the city’s public works pole yard at the Forest Hills Street corner, which today is used as a transfer station for road salt.

“In prior planning this land was always part of the Arborway yard,” Markiewicz said.

Markiewicz said there had been some design changes since the Dec. 9 meeting.

“The building will be nar-

Bus Garage

Continued on page 6



Father Yaroslav Nalysnyk of the Christ the King Ukrainian Catholic Church in Jamaica Plain spoke to the crisis in Ukraine.

PHOTO BY GRETTA GAFFIN

## Ukrainian church priest meets with WRBPA

Greta Gaffin  
Staff Reporter

Father Yaroslav Nalysnyk, the priest at Christ the King Ukrainian Catholic Church in Jamaica Plain, spoke at the West Roxbury Business and Professional Association (WRBPA) meeting on March 16.

Nalysnyk spoke to the horrors that Ukraine has been suffering due to the Russian invasion, calling it an “unprovoked attack on a freedom- and peace-loving people.” Ukrainian civilians have been killed, including children. Russia has attacked many Ukrainian hospitals, including maternity wards. It’s “brutal aggression,” said Rev. Nalysnyk.

Rev. Nalysnyk said he has been very moved by the outpouring of support from Bostonians for Ukraine. He preached at Mission Church in Mission Hill and said a Latino family told him they’re praying the rosary for Ukraine every night, and a young boy gave him two dollars to send to Ukraine.

People have asked him “where is God in this tragedy?”

“God – Jesus Christ is with every person who is suffering,” he said. “Jesus is with every mother who is grieving the loss of their sons and daughters. God is with every bleeding soldier on the battle-

Ukrainian Priest  
Continued on page 2

## COVID restrictions easing, locals optimistic

Ariane Komyati  
Staff Reporter

On Feb. 18, Boston’s proof of vaccination policy for indoor dining, fitness and entertainment was lifted.

Boston Mayor Michelle Wu and Dr. Bisola Ojikutu stated on Boston.gov that the public health data showed that Boston had a 4 percent community positivity rate, 90.7 percent occupancy rate of adult ICU beds, and a seven-day average of adult COVID-19 hospitalizations at 195.9 per day.

Mandates  
Continued on page 9



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Sacred Heart School

1035 Canterbury Street

Roslindale, MA 02131

Offers National School Lunch Program

As part of this program, Sacred Heart School will offer healthy meals every school day at NO COST due to the Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022. Students will be able to participate in these programs without having to pay a fee or submit a household application.

Non-Discrimination Statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Ukranian Priest

continued from page 1

field, and God is with every one of us.”

Nalysnyk said God is in charge, but he also said that “We have to pray as if everything depends on God. We have to work as if everything depends on us.”

He said in addition to prayer, action and truth are also important. People need to know the truth about Ukraine, and that Vladimir Putin, the president of the Russian Federation, is lying about his reasons for invading. Putin claims that this is to “De-Nazify and de-militarize” Ukraine, even though Ukraine voluntarily gave up their nuclear weapons thirty years ago, suffered greatly under German occupation, and has a Jewish president.

This is also not the first time Russia has attacked Ukraine: they also invaded and annexed Crimea, a Ukrainian peninsula in

the Black Sea, in 2014.

“The best sons and daughters of Ukraine were defending the country and lost their lives,” said Rev. Nalsynyk.

The Soviet government was also responsible for a famine that killed 5 million Ukrainians in 1932-33. The Soviet Union also banned the Ukrainian Catholic Church, and deported many priests, monks, nuns, and laity. Rev. Nalysnyk, who was previously a military doctor, was ordained secretly because of this. He came to the United States in 1992. His mother still lives in Ukraine, and she has told him it’s worse now in some ways than during WWII, because she can see on television the suffering of everyone in the country, not only people in her town.

At Dana-Farber, where Nalysnyk is one of the chaplains, patients in a weekly spirituality group are no longer interested in discussing their illness: only their fears about Ukraine. He said they feel confident in their doctors’ ability to treat them, but not in a positive outcome for the conflict.

According to WBUR, Massachusetts has about 10,000 Ukrainians, many of whom live in the Boston area, as well as many second-, third-, and fourth-generation Ukrainian-Americans. Jamaica Plain also has a Ukrainian Orthodox church (about 67 percent of Ukrainians are Eastern Ortho-

dox; there are also small minorities who are Jewish and Muslim).

Jim Hennigan of Hennigan Insurance runs the association meetings. He said they frequently have guest speakers, and it “just seemed timing was right” to host Rev. Nalysnyk, who he had previously known. The meeting had about 15 people present.

A raffle is being held with proceeds going to Christ the King Church, which will be sending the money to Ukraine. Tickets can be bought at Hennigan Insurance. Christ the King Church has also taken donations of items like socks and walkie-talkies to send to Ukraine, but they ask that you do not drop off items without asking first if they are needed. The Archdiocese of Boston is also running a collection, as is the Combined Jewish Philanthropies of Greater Boston. So far the WRBPA has raised \$2,500.

Mayor’s Office of Neighborhood Services West Roxbury liaison Jake Lacey was at the meeting, as were representatives from City Councilor Kendra Hicks (District 6) and State Senator Mike Rush’s (Norfolk and Suffolk)’s offices.

Christ the King Church has 8:30 a.m. Sunday Divine Liturgy in English, and 10 a.m. and Wednesday at 6 p.m. liturgy in Ukrainian.

Funds Now Available Through The


Allston-Brighton Homeownership Program!


Are you a first-time homebuyer who wants to purchase your home in Allston Brighton? You may qualify for up to \$50,000 in down payment and closing cost assistance!


Allston Brighton CDC and The Boston Home Center are partnering to offer the Allston-Brighton Homeownership Program. This is a new program made possible with funding from the development of Allston Yards.


This fund is available to income-eligible, first-time homebuyers to buy their first home in Allston Brighton.


To learn more, contact ABCDC at [homebuy@allstonbrightoncdc.org](mailto:homebuy@allstonbrightoncdc.org) or 617-787-3874 x35 or visit [allstonbrightoncdc.org/ab-homeownership-program](http://allstonbrightoncdc.org/ab-homeownership-program)















The parcels at 104 and 108 Walter St. will be developed and preserved for affordable housing and open space respectively.

COURTESY PHOTO

# Development and traffic issues dominate LANA board meeting

Susan Kryczka  
Staff Reporter

The Longfellow Area Neighborhood Association (LANA) held a virtual meeting on Monday, March 14 and extended beyond its allotted two hours in order to cover a packed agenda dominated by development and traffic discussions.

First up was newly-elected District 6 City Councilor Kendra Lara who appeared before the group for the first time. Lara stated her own interests in housing and open space development, which aligns well with some of LANA’s focused projects. LANA Chair Kathy McCabe welcomed further discussion with Lara on shared goals.

“We will follow up with you off-line,” said McCabe

A full hour was given to a presentation and discussion of the Habitat for Humanity (HFH) schematic plans for 104 Walter Street. Four affordable housing units will be built on the property, maintaining an existing building and a rear farmhouse plot, after the community fought for years to keep the adjacent

wetlands from being developed. James Kostaras, President/CEO of HFH shared the latest submission to the Boston Planning and Development Agency (BPDA).

“The BPDA will request design revisions and I’ll be looking to make those revisions...we’ll then be given final approval. We’re waiting for a response to the design plans. We’ll keep you posted as progress progresses,” Kostaras said.

Kostaras said there will be a lengthy process before construction can start, which he said includes a civil engineering review, an asbestos review, and a need for variances from the Boston Zoning Code. The group has walked the neighborhood to be sure they have an understanding of neighborhood buildings.

“We want something that fits the community,” said Robert Freni, architect for the project.

Resident Inci Kaya, an abutter, asked about the size of the proposed barn house in terms of the plot.

“We pushed off the property line 10 feet in both directions.” We’re not going to take

up any more land,” said Freni. As the project is still in the schematic phase, changes can be made. “It’s very easy to flex things.”

There was discussion about greenspace, hedging, possible fences and simpler plantings to reflect the proximity to the wetlands at the rear of the property.

“I’d like to see a naturalized connection if others agree,” said Board Member Julia O’Brien. Overall, the board was pleased with the project so far, along with the level of communication offered by HFH.

Boston Transportation Department (BTD) representatives presented proposed improvements for the South and Robert streets intersection, an ongoing issue in terms of safety for those using Fallon Field and its environs. A number of planned improvements include making pathways shorter and safer for pedestrians walking to the park. There will be ADA-compliant ramps and a bus stop in front of Green Tea. Allison Frazee, a neighbor with children, noted

LANA

Continued on page 9

**Prayer to the Blessed Virgin**  
*(Never known to fail!)*  
Oh, most beautiful flower of Mt. Carmel, fruitful vine, splendor of Heaven, Blessed Mother of the Son of God, Immaculate Virgin, assist me in this necessity. Oh Star of the Sea, help me and show me herein you are my mother. Oh Holy Mary, Mother of God, Queen of Heaven and Earth, I humbly beseech thee from the bottom of my heart to succor me in my necessity (make request). There are none that can withstand your power. Oh Mary, conceived without sin, pray for us who have recourse to thee (three times). Holy Mary, I place this cause in your hands (three times). Say this prayer for three consecutive days and then you must publish and it will be granted to you.  
—V.C.

**Miracle Prayer**  
Dear Heart of Jesus, in the past I have asked You for many favours. This time, I ask you this very special one (mention favour). Take it, dear Heart of Jesus, and place it within Your own broken heart where Your Father sees it. Then, in His merciful eyes, it will become Your favour, not mine. Amen.  
*Say for three days, promise publication and favour will be granted.*  
—V.C.

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According to artist Jill Rosati, the wall is in even worse condition than shown above in the "before" photo. COURTESY PHOTO

# ACA considers Ringer Mural proposal, 108 Allston St.

Jeff Sullivan  
Staff Reporter

The Allston Civic Association (ACA) met on March 16 and discussed a proposal from resident and artist Jill Rosati of Arts District Boston about a mural design for a wall at Ringer Park.

The wall sits directly south of the basketball and tennis courts, and would feature colorful and playful designs com-

bining themes of sport and nature.

Rosati said she started the process last year and will be submitting her design when she has ticked off all the boxes the City of Boston requires.

“The design was created by me and it features characters playing tennis and basketball,” she said. She added that the wall structure could use some work, as the paint on it now is deteriorating.

“I was there this weekend and it’s just not looking too hot,” she said. “The mural project is a collaboration with Allston Village Main Streets and they’ve agreed to fund half of it and protect it from vandalism if Arts District Boston is able to fund the other half.”

Residents interested in donating can go to <https://aca>

ACA  
Continued on page 7

## Novena to St. Clare

Ask St. Clare for three favors, 1 business, 2 impossible. Say nine Hail Marys for nine days, with lighted candle. Pray whether you believe or not. Publish on the ninth day. Powerful novena. Say “May the Sacred Heart of Jesus be praised, adored, glorified, now and forever, throughout the whole world. Amen.” *Your request will be granted, no matter how impossible it may seem.*

—S.G.H.

## Prayer to St. Jude

Most holy apostle, St. Jude Thaddeus, faithful servant and friend of Jesus, the name of the traitor who delivered your Beloved Master into the hands of His enemies has caused you to be forgotten by many, but the Church honors and invokes you universally as the Patron Saint of Hopeless cases and of things despaired of.

Please pray for me who am so miserable. Make use I implore you of that particular privilege accorded to you to bring visible and speedy help where help is almost despaired of. Come to my assistance in this great need that I may receive the consolations and help of Heaven in all my necessities, trials and tribulations, particularly (here make your request) and that I may bless God with you and all the elect forever.

I promise you, O blessed St. Jude, to be ever mindful of this great favor and I will never cease to honor you as my special and powerful patron and to to gratefully encourage devotion to you.

In thanksgiving for many answered prayers.

—S.G.H.

## Notice of Public Meeting:

Notice is hereby given that a Community Meeting for a Proposed Cannabis Establishment is scheduled for:

**Application Name:** Lowkey Cultivation, LLC  
**Application Address:** 48-54 Walter Street, Hyde Park MA 02136  
**License Type:** Cultivation Use

**Join virtually at the WebEx Event link below – this is NOT an in person meeting:**

**Proposal:** Change of occupancy from warehouse to Marijuana Establishment. Cannabis Establishment to be operated at the address of 48-54 Walter Street – the scheduled date for the meeting will be on April 19th, 2022 at 6:30 PM via the Webex Meeting Forum.

**Date:** Tuesday, April 19, 2022  
**Time:** 6:30PM  
**Event Link:** <https://bit.ly/3oMQcvF>  
**Event password:** Lowkey  
**Dial-in Number:** +1-408-418-9388  
**Access Code:** 2340 596 6944


There will be an opportunity for the public to raise comments, questions, and concerns.

**If you any questions or comments about this proposal, please contact:**

**Jeff Similien** | Owner/ CEO of Lowkey Cultivation Dispensary  
(617) 894-2266 | [jeff@lowkeydispensary.com](mailto:jeff@lowkeydispensary.com) or


**Denyel Fonseca** | Hyde Park Liaison for Mayor’s Office of Neighborhood Services  
(617) 635-4830 | [denyel.fonseca@boston.gov](mailto:denyel.fonseca@boston.gov)

Please note, the City does not represent the owner(s)/developer(s)/attorney(s)/applicant(s). The purpose of this meeting is to get community input and listen to the resident’s positions on this proposal. This flier has been dropped off by the proponents per the city’s request.




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Legals

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

INFORMAL PROBATE  
PUBLICATION NOTICE

SU22P0149EA

Estate of: Gary Lawrence McWilliamsSuffolk Division

Date of Death: October 9, 2021

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

Petitioner Theodora E. McWilliams of Boston, MA

A Will has been admitted to informal probate.

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

Boston Bulletin: 3/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR  
FORMAL ADJUDICATION

DOCKET No. SU22P0111EA

Estate of: Francis J. Strenk, Jr.

Date of Death: 07/10/2021

Suffolk Probate and Family Court  
24 New Chardon Street  
Boston, MA 02114  
617-788-8300

To all interested persons:

A Petition for **Formal Adjudication of Intestacy and Appointment of Personal Representative** has been filed by

Robert R. LeBel of Tolland, CT

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

Robert R. LeBel of Tolland, CT

be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **unsupervised administration.**

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 A.M on the return day of **04/18/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED  
ADMINISTRATION UNDER THE  
MASSACHUSETTS UNIFORM  
PROBATE CODE (MUPC)

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

WITNESS Hon. Brian J. Dunn,  
First Justice of this Court  
Date: March 07, 2022  
Felix Arroyo, Register of Probate

Boston Bulletin: 03/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR  
FORMAL ADJUDICATION

DOCKET No. SU22P0223EA

Estate of: Stephen Henderson  
Also Know As:  
Stephen A. Henderson

Date of Death: 01/09/2022

Suffolk Probate and Family Court  
24 New Chardon Street  
Boston, MA 02114  
617-788-8300

To all interested persons:

A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by

Kelly Kopsco of Walpole, MA

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

Kelly Kopsco of Walpole, MA

be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **unsupervised administration.**

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 A.M on the return day of **04/21/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED  
ADMINISTRATION UNDER THE  
MASSACHUSETTS UNIFORM  
PROBATE CODE (MUPC)

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

WITNESS Hon. Brian J. Dunn,  
First Justice of this Court  
Date: March 17, 2022  
Felix Arroyo, Register of Probate

Hyde Park Bulletin: 03/24/2022

The Bulletin  
Bus Garagecontinued from page 1

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

INFORMAL PROBATE  
PUBLICATION NOTICE

Suffolk Division

DOCKET No. SU21P1553EA

Estate of: Jill Patrice Nihill

Date of Death: October 1, 2019

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

Petitioner Jill P. Nihill of Boston

Judith Dragoslis of Palm Coast, FL

has been informally appointed as the Personal Representative of the estate to serve without surety on the bond.

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

Boston Bulletin: 03/24/2022

Commonwealth of Massachusetts  
The Trial Court – Probate and Family Court Department

SUFFOLK Division

DOCKET No. SU21D0914DR

DIVORCE SUMMONS BY PUBLICATION AND MAILING

Hector B. Acosta vs. Sandra Baez

Suffolk Probate and Family Court  
24 New Chardon Street  
Boston, MA 02114

To the Defendant:

The Plaintiff has filed a Complaint for Divorce requesting that the Court grant a divorce for Irretrievable breakdown of the marriage.

The Complaint is on file at the Court.

An Automatic Restraining Order has been entered in this matter preventing you from taking any action which would negatively impact the current financial status of either party. **SEE Supplemental Probate Court Rule 411.**

You are hereby summoned and required to serve upon: **Hector B. Acosta, 331 Huntington Avenue, Hyde Park, MA 02136**, your answer, if any, on or before **05/05/2022**. If you fail to do so, the court will proceed to the hearing and adjudication of this action. You are also required to file a copy of your answer, if any, in the office of the Register of this Court.

Witness, Hon. Brian J. Dunn, First Justice of this Court  
March 3, 2022  
Felix D. Arroyo, Register of Probate

Hyde Park Bulletin: 3/24/2022

March 24, 2022

new owners JPNDC that is also in the throes of affordable housing funding rounds.

This is a four-story, 46-unit residence on the site of Mello fuel that received zoning approval for a change of ownership on Dec. 15, 2021.

Across the road from this, 50 Stedman St. is nearing completion as work began just as the pandemic opened up in March 2020.

A very contentious issue among the SNA, the three-story, 21-unit building was first proposed by Helm Investments in 2017.

That same partnership also built 76 Stonley Rd., another hot item for SNA, completed in 2019.

The partnership, Patrick Moloney, Sean Morrissey and Colm O’Shea, submitted a letter of intent on Nov. 21, 2021 for a three-story, self-storage building at 75 Stedman replacing a construction yard that would back up to the Lotus Street fire lane of the bus garage.

After two hard won housing developments, Moloney, Morrissey and O’Shea admitted at their first presentation to the SNA on May 10, 2021 that housing was difficult to build there and chose to invest in a non-residential building on the 1.24-acre parcel.

The SNA is opposed to the self-storage building and SNA chair Jon McCurdy said on March 14 that the 75 Stedman subcommittee would convene and draft a letter to the development partners asking them to “make different plans.”

The partners have not filed the project notification form they indicated to the BPDA they would submit by the end of December 2021.

Commonwealth of Massachusetts  
The Trial Court  
Probate and Family Court Department

DOCKET No. SU21C0102CA

CITATION ON PETITION TO  
CHANGE NAME

Suffolk Probate and Family Court  
24 New Chardon Street  
Boston, MA 02114  
617-788-8300

In the Matter of: Khiron  
Keiomyonie Jurrell Johnson Harper

A Petition to Change Name of Minor has been filed by  
Khiron Keiomyonie Jurrell Johnson Harper of Mattapan, MA requesting that the court enter a Decree changing their name to:  
Khiron Antonio Harper

IMPORTANT NOTICE

Any person may appear for purposes of objecting to the petition by filing an appearance at: **Suffolk Probate and Family Court** before 10:00 a.m on the return day of **04/07/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance if you object to this proceeding.

WITNESS, Hon. Brian J. Dunn,  
First Justice of this Court  
Date: March 16, 2022  
Felix Arroyo, Register

Hyde Park Bulletin: 03/24/22



www.indiegogo.com/projects/ringer-park-mural#/ to donate to the project.

“The renovation will create a positive visual environment for the local youth in the area,” she said. “Both a school and a community center use this park and it’s just not a welcoming environment. We’ve gotten support from the community center so far.”

Rosati said if they get enough funding, they will be able to start and finish the mural in one month.

In other news, Attorney Paul Rufo and Arx Urban Development partner Benjamin Moll came to discuss the 47-unit building proposed for 46 Leo Birmingham Pkwy.

Moll said they are very early in the process, and came to the ACA to get feedback from the community. The project consists of six stories and 42,615 square feet on 12,826 square feet of land. The building will have 13 off-street parking spots and will include a shared electric vehicle for tenants to use, along with street-level bike spaces to reduce vehicular traffic.

“It’s really a push from the City of Boston to reduce our parking ratio,” Moll said. “The site is currently the State Po-

lice Barracks on Leo Birmingham Parkway. We’re just over half a mile from the Boston Landing site, and there are a couple of bus lines as well.”

ACA President Tony D’Isidoro asked about residents who are concerned about where construction workers and materials are parked or stored.

“All these projects along Birmingham Parkway and Soldiers Field Road have concerns about using up public parking, for example, at Herter Park or Artesani Park,” he said. “So if you could keep that in the back of your mind when the time comes, try to give as much consideration as you can.”

Moll said that for a previous project, he’s been renting and shuttling workers to and from a private parking lot.

“I envision we’ll have a similar plan when we get further along the process,” he said.

Resident Jo Ann Barbour asked about affordability. Moll said they are contemplating 15 percent of the units to be income restricted affordable (as per the city’s Inclusionary Development Policy) at around 70 percent of the area median income (AMI). That translates

The Bulletin currently to a couple jointly making \$67,650, according to the Boston Planning and Development Agency (BPDA). ACA member Bob Pessek said he felt the building was too large and too boxy, and that it did not include enough greenspace.

In other news, development attorney Jay Walsh and Choo & Company Architect Elida Alba presented a new plan for 108 Allston St. around the area of Ringer Park for a small townhouse-style building at three stories high and six homeownership units taking up about 4,000 square feet.

Alba said each unit would have one parking garage space and bike parking spaces as well.

Pessek said he felt they should save the current house on the property. “That house is about 120 years old,” he said.

Member Bruce Kline said he felt the townhouses were out of context with the neighborhood.

“It looks totally out of place; that flat roof just doesn’t seem to make it,” he said. “You look down the whole street and there are slanted roofs, and this is flat. Without even a consideration for solar, I can’t go along with it.”

The next ACA meeting is scheduled for 6 p.m. on April 20.

# BCYF Spelling Bee announces 2022 winners



More than 3,000 young people participated in local bees to qualify for the Boston Centers for Youth and Families Citywide Bee. The winner of this year’s Bee was Sulayman Abdurahman, age 12, who won by spelling “Apres” correctly. The second place finisher was Anneliese Yu, age 12, from Boston’s West End and coming in third was Josephine LoRusso, age 13, from the South End.

PHOTO COURTESY OF THE CITY OF BOSTON MAYOR’S OFFICE

Commonwealth of Massachusetts  
The Trial Court – Probate and Family Court Department

Docket No. SU18P1029EA

CITATION ON PETITION FOR ORDER OF COMPLETE SETTLEMENT

Suffolk Probate and Family Court  
24 New Chardon Street  
Boston, MA 02114  
617-788-8300

Estate of: Lilian Candia Go  
Date of Death: 03/11/2018

A Petition for Order of Complete Settlement has been filed by:  
**Lyn G. Japus of Edinburg, TX**  
requesting that the court enter a formal Decree of Complete Settlement including the allowance of a final account, a determination of testacy and heirs at law, a determination of heirs at law,, a first and Final Account and other such relief as may be requested in the Petition.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00a.m. on the return day of **04/28/2022**.

This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return day, action may be taken without further notice to you.

**Witness, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 17, 2022  
Felix D Arroyo Register of Probate    West Roxbury/Roslindale Bulletin: 03/24/2022

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Diana Bradley  
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**60 Johnswood Road**  
Roslindale  
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**79 Robert Street**  
Roslindale  
Sold \$1,000,000

**30 Church Street**  
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DEATHS

BARILE

Gina E. Age 94, a longtime Boston area resident and native, passed away peacefully on March 12, 2022. Born in Boston, MA on February 3, 1928, she was the daughter of Constantino and Assunta “Susie” Barile. Gina retired from the U.S. Department of State on March 3, 1988, after 32 years of loyal and meritorious service. During her career, Gina worked as an executive secretary in the U. S. Foreign Service for seven different ambassadors with assignments at American embassies in Argentina, Belgium, France, Italy, Jordan, Sweden, and Yugoslavia. She received a degree in Commercial Science from Boston University and was fluent in several foreign languages. She is survived by her sister Lillian Justice of Reston, VA; nieces, Melissa Hoff and Lydia Melech of Apex, NC, and Amy Justice of Reston, VA. She was predeceased by both her parents and her brother Joseph Barile. Funeral from the P.E. Murray - F.J. Higgins, George F. Doherty & Sons Funeral Home, 2000 Centre St., WEST ROXBURY. Interment St. Joseph Cemetery, West Roxbury. In lieu of flowers, memorial donations may be made to Franciscan Monastery of the Holy Land. <https://myfranciscan.org/donate/> For directions and guestbook, [pemurrayfuneral.com](http://pemurrayfuneral.com) P.E. Murray - F.J. Higgins George F. Doherty & Sons West Roxbury 617 325 2000.

LYNCH

Marilyn R. of Chestnut Hill, died peacefully on March 1, 2022, at the age of 89. Marilyn grew up on Colberg Avenue in Roslindale and lived most of her life in Chestnut Hill. She graduated from Trinity College and received a master’s degree in chemistry from Harvard University. Marilyn applied her analytical and computer science skills in the work she did for Honeywell, Chase Bank, and the Massachusetts Rate Setting Commission. In her retirement, Marilyn was an avid traveler who had a fondness for Machu Picchu, Europe, and the Caribbean. She was also a dedicated member of the Great Books Club. Marilyn is remembered by her sister Barbara Lyons, brother-in-law William Lyons, and nieces and nephews Carolyn Fanning, Mary Latz, Sean Mulkern, and Rob Lynch. She was preceded in death by her sister Joan Mulkern and her brother Robert Lynch. Our family would like to thank the caregivers at St Patrick’s Manor Nursing Home and CS&R Quality Home Care for their compassionate and dedicated care. A Mass of Christian Burial was celebrated in the Holy Name Church, 1689 Centre St. West Roxbury, on Wednesday, March 16. Interment, St. Joseph Cemetery. [www.lawlerfuneralhome.com](http://www.lawlerfuneralhome.com) 617323-5600.

WINSLOW

Steven F. Sr. of West Roxbury, passed away unexpectedly at age 62, on March 13, 2022. Beloved father of Steven F. Winslow, Jr. of Dedham, Ashley M. (Winslow) Koons and her husband Matthew of Walpole, Jonathan J. Winslow and his fiancée Casey McIntyre of Walpole. Devoted “Papa” of Jake, Cameron and Conor. Son of the late Frank E. and Marilyn (Malone) Winslow. Brother of Marilyn Winslow of N. Attleboro, Deborah Zuzick and her husband Paul of Plainville, Lorie Barrett and her husband James of Plymouth, Anne Baker and her husband Billy of N. Attleboro. Nephew of Janice Chandler of Hingham. Also survived by many nieces and nephews. Co-owner of Parkway Towing and Parkway Auto Body. Steven enjoyed traveling New England going to auto racing such as stock car and modified series as well as spending time with his kids and grandkids. Funeral from the William J. Gormley Funeral Home, 2055 Centre St., WEST ROXBURY. Interment, Brookdale Cemetery. In lieu of flowers, donations may be made in his name to the Animal Rescue League of Boston, 10 Chandler Street, Boston, MA 02116. For directions and guestbook, [gormleyfuneral.com](http://gormleyfuneral.com) William J. Gormley Funeral Service 617-323-8600.

Letters continued from page 4

available nearby” (p. 7).

The study data included the availability of public parking in Roslindale Square’s “commercial core” (including portions of South Street, Belgrade Ave, Birch Street, and Corinth Street). Per industry guidelines, the sampling period comprised parts of two days. According to the report, these streets “were at or near 100% occupancy for much of the collection periods” (p. 4).

This is a problem for customers and residents as the BTd offers that 15% to 30% of street parking spaces should be empty at any point in time. If 100% of the parking spaces are taken, cars looking for spaces likely cannot find one.

Not only is there a lack of parking, but the number of available parking spaces has been reduced as a result of bus stop and other changes. According to a BTd Director, Roslindale Square has permanently lost 23 spaces on Poplar, Corinth, South, and Belgrade Streets. Spaces were

also lost in the Metropolitan (“Taft Hill”) Lot. Another 8 spaces have been temporarily reduced to 5-minute parking. Furthermore, additional but as yet uncounted spaces were also lost on Washington Street.

This lack of and loss of parking may also relate to another issue. There are approximately 11 empty storefronts in and near the Square. Some have been vacant for quite some time, such as the Unleashed former site. Some are newly empty, such as the Patch Realty Group site. Whether or not these empty stores relate to a lack of available parking has not yet been determined. However, we should consider that new business owners would be hesitant to fill these empty locations if a lack of parking impedes customers shopping or accessing services.

Finally, there is the potential for further reductions in customer parking space availability. A number of new housing developments have been proposed in and near the Square on streets

that the BTd considers available for customer parking (p. 5). Nearly all of the proposed developments either do not include parking or include less than 1 parking space per rental unit or condominium. Thus, residents of these new developments who own cars may end up competing for publicly available parking. In turn, this would likely further reduce the parking available for business customers and put a further strain on local businesses.

Some may maintain that in a transit-rich area customers and residents should not rely on private vehicles. This aspirational goal maybe informed by a forthcoming BTd survey. Specifically, the BTd will gather more information by conducting a confidential survey of small businesses within the parking study area. Once complete, the BTd will consider how to address Roslindale Square’s current parking situation.

Laurel E. Radwin,  
RN, Ph.D.  
Boston



LANA continued from page 3

that crossing the street to the playground can currently be hazardous.

“We got stuck in the little island and it feels very unsafe,” she said.

Fraze then mentioned a possible pot shop going into the area and whether anyone is looking at the traffic increase that it could bring. BTB representatives at the meeting said they did not know about the shop.

O’Brien then asked about the bus turning radius at the new intersection and whether it is adequate to go to Robert Street instead of South Walter Street. This is something that has to be discussed with MBTA.

“Is there a more global view for Fallon Field to the Arboretum?” asked Daithi Blair.

Charlotte Fleetwood of the BTB said there is not a plan for all the way up from Fallon Field. Kevin Schofield asked if any work would be done in front of his home on Ashfield Street.

“We can definitely work with you on what happens in front of your house,” said Fleetwood.

Board members were asked to support a proposed zoning approval request for 1472 Centre St. to add an additional unit to an existing three family, non-owner-occupied house making it a four family. The project plan is to

create a 900-square-foot, two-bedroom unit in the basement. The project was previously refused on a number of issues including basement units not being allowed in Roslindale, insufficient parking, and insufficient open space. Shane Losi, architect, presented new plans which address these violations. Changes include a small window to be added in the front, enlarging other windows and adding a door on the back and side. There currently exist four tandem parking spots and a garage space with the new schematic suggesting seven parking spaces, none of them tandem. Sprinklers will be installed in all four units.

Jay Haiij, the owner, has owned the building for a few years. “I was hoping to put another unit in the basement floor.”

The Board remained unconvinced about the changes.

“This is a proposal to request even further beyond the zoning for no reason than profit return,” said O’Brien. “It doesn’t have two feet to stand on.”

Board Member Rachel Young reminded the group that they had approved a two-family change to a three-family unit in the past that was also non-owner occupied and that was approved. Despite the possible inconsistency, a motion for LANA to oppose the request was approved by the board.

Mandates continued from page 1

Boston’s indoor mask mandate was officially lifted on Mar. 5 as COVID-19 cases continued to decline in Boston and the rest of Massachusetts. Public transportation, health care settings, and care settings are still subject to state and federal mask orders.

Lora Estey of Distraction Brewing Co. in Roslindale says she has seen people feel more comfortable coming inside the craft brewery.

“However, this trend happened before the mask mandates were lifted. It happened as the COVID numbers were drastically falling starting mid-February. The lifting of the mask mandate probably helped, but we were already on the trend of people feeling comfortable to enjoy our taproom,” she said.

Some businesses in Boston stated they are relieved about the lifting of the proof of vaccination requirement and the mask mandate, including Tina Ramos, who owns the CrossFit Boston Iron and Grit in West Roxbury.

“We have seen a difference

in the attitude of people who are returning to the gym. They appear more optimistic and ready to move forward. It is going to take awhile to rebuild our business, however I remain committed to creating a strong community. My hope is small businesses get the support of the Mayor and less restrictions on operating our businesses,” Ramos said.

Other business owners were pleased to see Mayor Wu’s vaccine requirement instituted last month, saying it gave them the confidence that patrons could come together as a community again.

“Within a week, 90 percent of our members had shown their vaccination cards to us, and we made a note on their account such that we didn’t need to see the card a second time. The whole process was very easy, and new members eagerly showed their cards when signing up for a membership. At this point, everyone who is going to get vaccinated is, and there’s no need to keep checking. I support and applaud

Mayor Wu’s actions; we would have been comfortable with a proof of vaccination requirement for months longer if needed,” stated Logan Miller, owner of JP Crossfit.

Tania Vega of River Grille in Hyde Park said that they did not see much of a difference when the mandates were lifted.

“When we ask our customers to show proof of vaccination, they always show it, with no problem,” Vega said. “Anyway, we don’t have a lot of customers eating at the restaurant. Most people order for pickup or delivery.”

Vega added that she didn’t see the purpose of the requirement since “even with vaccines people still get sick.”

Mayor Wu and Dr. Ojikutu, the Commissioner of Public Health and Executive Director of the Boston Public Health Commission, announced last week that Boston’s COVID-19 Public Health Emergency Declaration will end on Apr. 1. The declaration has been in place since March 15, 2020.

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### St. Jude’s Novena

May the Sacred Heart of Jesus be adored, glorified, loved and preserved throughout the world, now and forever. Sacred Heart of Jesus pray for us. St. Jude, worker of miracles, pray for us. St. Jude, helper of the hopeless, pray for us. Say this prayer 9 times a day. By the 9<sup>th</sup> day your prayer will be answered. It has never been known to fail. Publication must be promised. Thank you St. Jude. My Prayers were answered.

*In gratitude for helping me.*  
—P.S.D.

### Prayer to the Blessed Virgin

(Never known to fail!)

Oh, most beautiful flower of Mt. Carmel, fruitful vine, splendor of Heaven, Blessed Mother of the Son of God, Immaculate Virgin, assist me in this necessity. Oh Star of the Sea, help me and show me herein you are my mother. Oh Holy Mary, Mother of God, Queen of Heaven and Earth, I humbly beseech thee from the bottom of my heart to succor me in my necessity (make request). There are none that can withstand your power. Oh Mary, conceived without sin, pray for us who have recourse to thee (three times). Holy Mary, I place this cause in your hands (three times). Say this prayer for three consecutive days and then you must publish and it will be granted to you.

—S.G.H.

### A Prayer to the Holy Spirit

Holy Spirit, you who made me see everything and showed me the way to reach my ideal. You who gave me the divine gift to forgive and forget the wrong that is done to me and you who are in all instances of my life with me. I, in this short dialogue want to thank you for everything and confirm once more that I never want to be separated from you no matter how great the material desire may be. I want to be with you and my loved ones in your perpetual glory. Amen. Thank you for your love towards me and my loved ones. Persons must pray the prayer 3 consecutive days without asking your wish. After 3rd day, wish may be granted no matter how difficult it may be. Then promise to publish this dialogue as soon as this favor is granted.

—S.G.H.



Notice of Self Storage Sale

Please take notice Prime Storage - Hyde Park located at 1641 Hyde Park Ave., Hyde Park, MA 02136 intends to hold an auction to sell the goods stored by the following tenants at the storage facility. The sale will occur as an online auction via www.storage-treasures.com on 4/13/2022 at 12:00 PM. Unless stated otherwise the description of the contents are household goods and furnishings. Cheryl Nichols unit #2042; Carmen Cortez unit #P7. All property is being stored at the above self-storage facility. This sale may be withdrawn at any time without notice. Certain terms and conditions apply. See manager for details.

Hyde Park Bulletin: 03/24/22, 03/31/22

Legals

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

INFORMAL PROBATE PUBLICATION NOTICE

SU21P2666EA

Estate of: Ronald Paul O’Keefe

Suffolk Division

Also Known As: Ronald P. O’Keefe

Date of Death: September 20, 2021

To all persons interested in the above captioned estate, by Petition of **Petitioner Helen M. O’Keefe of Boston, MA**

A Will has been admitted to informal probate. **Helen M. O’Keefe of Boston, MA** has been informally appointed as the Personal Representative of the estate to serve without surety on the bond.

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

West Roxbury Bulletin: 3/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION

DOCKET No. SU21P1538EA

Estate of: Erasmia Metallides

Date of Death: 05/08/2021

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

617-788-8300

To all interested persons:

A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by:

**Mary Djaferis of Newton, MA**

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

**Mary Djaferis of Newton, MA and Themis Metallides of Boston MA**

be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in an **unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of **04/27/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

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

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 16, 2022  
Felix Arroyo, Register of Probate

Boston Bulletin: 03/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION

DOCKET No. SU22P0138EA

Estate of: William Stephen McAbee

Date of Death: 10/09/2021

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

617-788-8300

To all interested persons:

A Petition for **Formal Adjudication of Intestacy and Appointment of Personal Representative** has been filed by:

**John P. McAbee of Cummaquid, MA**

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

**John P. McAbee of Cummaquid**

be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in an **unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of **04/27/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

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

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 16, 2022  
Felix Arroyo, Register of Probate

Boston Bulletin: 3/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION

DOCKET No. SU21P1718EA

Estate of: Melvin Lowell George

Date of Death: 06/10/2021

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

617-788-8300

To all interested persons:

A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by:

**Melvin E. George of Teaneck, NJ**

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

**Melvin E. George of Teaneck, NJ**

be appointed as Personal Representative(s) of said estate to serve on the bond in an **unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of **04/25/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

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

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 14, 2022  
Felix Arroyo, Register of Probate

Hyde Park Bulletin: 3/24/2022

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Commonwealth of Massachusetts  
The Trial Court – Probate and Family Court Department

DOCKET No. SU21C0399CA

CITATION ON PETITION TO CHANGE NAME

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

617-788-8300

In the Matter of: Yovonyiie Gary Johnson Harper

A Petition to Change Name of Minor

has been filed by Yovonyiie Gary Johnson Harper of Mattapan, MA

requesting that the court enter a Decree changing their name to: Yovonyiie King Harper

IMPORTANT NOTICE

Any person may appear for purposes of objecting to the petition by filing an appearance at: **Suffolk Probate and Family Court** before 10:00 a.m on the return day of **04/07/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance if you object to this proceeding.

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 16, 2022  
Felix Arroyo, Register

Hyde Park Bulletin: 03/24/22

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION

DOCKET No. SU22P0382EA

Estate of: Petrona Reyes

Date of Death: 08/06/2021

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

617-788-8300

To all interested persons:

A Petition for **Formal Appointment of Personal Representative** has been filed by:

**Daniel Reyes of Hyde Park, MA**

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

**Daniel Reyes of Hyde Park, MA**

be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in an **unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of **04/14/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

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

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: March 11, 2022  
Felix Arroyo, Register of Probate

Hyde Park Bulletin: 3/24/2022

Commonwealth of Massachusetts  
The Trial Court Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION

DOCKET No. SU21P2706EA

Estate of: Stephen R. Armstrong

Date of Death: 08/12/2021

Suffolk Probate and Family Court

24 New Chardon Street

Boston, MA 02114

(617) 788-8300

To all interested persons:

A Petition for **Formal Adjudication of Intestacy and Appointment of Personal Representative** has been filed by

**Hettie Armstrong of Roslindale, MA**

requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that:

**Hettie Armstrong of Roslindale, MA**

be appointed as Personal Representative(s) of said estate to serve **Without Surety on the bond in unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. **You have a right to object to this proceeding.** To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 A.M on the return day of **04/11/2022**. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

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

**WITNESS, Hon. Brian J. Dunn, First Justice of this Court**  
Date: February 28, 2022  
Felix D. Arroyo, Register of Probate

West Roxbury/Roslindale Bulletin: 3/24/2022

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# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

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



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

a. Date of publication:

b. Name of publication:

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

a. Date notice filed:

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

a. Date notice(s) mailed:

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



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



# Host Community Agreement Certification Form

## Instructions

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

## Certification

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

1. Name of applicant:

Lowkey Cultivation, LLC

2. Name of applicant's authorized representative:

Jeff Similien

3. Signature of applicant's authorized representative:



4. Name of municipality:

City of Boston

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

Jasmin Winn



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



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

jasmin.winn@boston.gov

8. Host community agreement execution date:

July 19, 2022





## **Plan for Positive Impact**

### **Intent**

Lowkey Cultivation's first expected location will be at 54 Walter Street in the culturally rich Hyde Park neighborhood. Hyde Park is located in Boston. The location of our Marijuana Establishment is in Census Tract 1403. Areas impacted by Establishment cover tracts 1304.06; 1401.02; 1401.05; 1401.06; 1401.07; 1402.01; 1402.02; 1404.4; 1404.5; 1401.07; 9807.

The neighborhood of Hyde Park is poised to benefit substantially from our Marijuana Establishment. Specifically, we aim to infuse tangible value into this community through our plan to re-invest a portion of our revenue into the community, as described in this Positive Impact Plan. Further, we will create pipelines for success for Lowkey employees through our homeownership incubator program. Our Positive Impact Plan will adhere to the requirements set forth in 935 CMR 500.105(4), such as advertising, branding, marketing and sponsorships that are displayed in a clear and non-deceptive manner; and ensuring advertisements include the statements, "Please Consume Responsibly", "For use only by adults 21 years of age or older. Keep out of the reach of children," and "Marijuana should not be used by women who are pregnant or breastfeeding." Further, actions of Lowkey's Marijuana establishment and programs instituted will not violate the Commission's regulations regarding limitations on ownership or control or other applicable laws. The progress or success of this Plan shall be documented upon renewal and each year thereafter.

### **Goals**

1. Recruitment and Hiring – Create jobs from areas of disproportionate impact with a progressive compensation structure, employee benefits and growth opportunities that provide a living wage. Our goal is to hire at least 51% of our workforce from Boston. Within that percentage of Boston employees, our goal is to hire at least 80% from the town of Hyde Park.
2. Home Buyer and Community Education Programs – Our goal is to create an annual home buyer course for selected employees who will complete a mandatory home buyer/ real estate education course and, at the end of the course, receive \$4,000 from Lowkey to be used toward their home purchase closing costs. Our education programs will focus on community education about drug abuse prevention and entrepreneurial education. We will earmark \$100,000 to facilitate these educational programs, spread out over five years.



## Programs

### Recruitment and Hiring Program

Providing opportunities for gainful employment is a primary driver in helping populations disproportionately affected by marijuana prohibition. Working with Viridity Group, a human resources organization, Lowkey's hiring process will focus on hiring a workforce drawn from the Boston community, with heightened attention to the Hyde Park-Codman Square neighborhood.

Lowkey understands the importance of having a workforce that draws from disproportionately adversely impacted populations within the larger workforce. As such, Lowkey will employ members of the Boston community who have past drug convictions and /or residents with parents or spouses who have drug convictions.

Our employee packages will include a minimum \$18 per hour starting salary with room for growth, health benefits coverage, and subsidy for MBTA passes for each employee. We expect to hire a total of 15 employees (full and part-time).

To achieve our recruitment and hiring goals, we will:

1. Work with Viridity Group to source talent from the above listed groups who will go through a standard hiring process.
2. Recruit 20% of employees hired to work for Lowkey will be Boston residents and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions, although our goal is 80%.
3. We plan to not only use Viridity Group's employee services to recruit prospective employees, but also, advertise employment opportunities on the Lowkey website, and through flyering in Hyde Park.
  - i. We plan to implement this hiring program 60 days prior to our expected opening date.
  - ii. We will hold a job fair 90 days after receiving our provisional license from the Commission.
  - iii. Subsequent job fairs will occur on an annual and as-needed basis. We will post job openings annually in on Indeed.com and the Hyde Park Bulletin Newspaper encouraging Massachusetts residents who have past drug convictions to apply for employment. Of the employees hired, Lowkey will count the number of individuals hired who have past drug convictions. This number will be assessed from the total number of individuals hired to ensure a designated percentage of all individuals hired fall within this goal. Further, we expect to maintain a relationship with Viridity Group to assist us in recruitment and hiring efforts. Our hiring program will not violate the Commission's regulations with respect to the limitations on ownership or control or other applicable state laws.
  - iv. All job postings will explicitly promote the hiring priorities of this plan and encourage individuals who fall into the plan populations to apply.
4. Hiring preference will be given to individuals who meet the criteria of the plan.



### Home Buyer and Education Programs

Our employee home buyer program will work with selected employees to complete a home buyer course taught by a certified home buyer instructor. At the successful completion of the program, these employees will receive first home buyer certificates and \$4,000 each from Lowkey to be applied towards their closing costs.

1. Employees selected for the program will be selected based on a raffle system. 3-4 employees will be selected annually for this program
2. Successful completion is defined by (1) attending all assigned class dates, with employees allowed to miss one date for medical or other emergency reasons, (2) completion of all in-class and homework assignments, (3) receipt of a first home buyer certificate
3. In addition to completing the course, the employee must hire as their buyer agent, an agent from Boston Trust Realty Group in order to receive the \$4,000 closing costs.
4. Lowkey will count the number of individuals selected annually for this program. This number will be assessed to ensure that at least three (3) employees are selected annually for this program. Lowkey will keep track of those selected for the program and the percentage that successfully complete the program.

Our education programs will focus on community education on drug abuse prevention and entrepreneurial education through quarterly held workshops. The entrepreneurial education sessions will target those who have criminal record histories that resulted in a conviction. These sessions will provide informational resources for prospective and current small business owners who have the aforementioned criminal record histories that guide them on grants and other programs for business owners, ways to seal their criminal record, and how to structure their business plans.

We believe that by hiring locally, engaging in community projects and giving back, we will empower those who have been disproportionately affected by cannabis prohibition, change their lives and create a lasting legacy. Through these efforts, Out team at Lowkey Cultivation will use our influence and reach to affect positive change in the Hyde Park Neighborhood and beyond.

**LOWKEY CULTIVATION, LLC**  
**MASSACHUSETTS LIMITED LIABILITY COMPANY**

**OPERATING AGREEMENT**  
**MANAGER MANAGED**

EFFECTIVE DATE: SEPTEMBER 3, 2022

PARTIES: Jeff Similien

RECITAL: The parties to this agreement (the "Members") are entering into this agreement for the purpose of forming a limited liability company under the Business Corporation Act of the Commonwealth of MASSACHUSETTS (the "Act").

**AGREEMENTS:**

**1. FORMATION**

**1.1 Name.** The name of this limited liability company (the "Company") is Lowkey Cultivation, LLC.

**1.2 Articles of Organization.** Articles of organization for the Company were filed with the Secretary of Commonwealth of MASSACHUSETTS on September 3, 2022.

**1.3 Duration.** The Company will exist until dissolved as provided in this agreement.

**1.4 Principal Office.** The Company's principal office will initially be at 1601 Blue Hill Avenue suite 201, Boston, MA 02126, USA but it may be relocated by the Members at anytime.

**1.5 Designated Office and Agent for Service of Process.** The Company's initial designated office will be at 1601 Blue Hill Avenue suite 201, Boston, MA 02126, USA and the name of its initial resident agent for service of process at that address will be Jeff Similien. The Company's designated office and its agent for service of the process may only be changed by filing a notice of the change with the Secretary of Commonwealth of MASSACHUSETTS in which the articles of organization of the Company were filed.

**1.6 Purposes and Powers.** The Company is formed for the purpose of engaging in CULTIVATION CANNABIS. The Company has the power to do all things necessary, incident, or in furtherance of that business.

**1.7 Title to Assets.** Title to all assets of the Company will be held in the name of the Company. No Member has any right to the assets of the Company or any ownership interest in those assets except indirectly as a result of the Member's ownership of an interest in the Company. No Member has any right to partition any assets of the Company or any right to receive any specific assets upon liquidation of the Company or upon any other distribution from the Company.

**2. MEMBERS, CONTRIBUTIONS AND INTERESTS**

**2.1 Initial Members.** The names and addresses of the Members of the Company, the amounts

of their initial capital contributions, and their initial Ownership Interests are stated in *Schedule A: Capital Contribution*. Each Member's Ownership Interest at any time will be determined by the ratio of the Member's aggregate capital contributions to the aggregate capital contributions of all Members.

**2.2 Initial Capital Contributions.** The initial capital contributions of and must be paid to the Company, in cash, immediately after all parties have signed this agreement. The initial capital contribution of Member must be made by transferring to the Company the assets listed on the attached Schedule A. The transfer of the assets must be made immediately after all parties have signed this agreement by Member executing and delivering to the Company such documents as may be necessary to transfer the assets listed on the attached Schedule A to the Company free and clear of all liens and encumbrances. The transfer documents must include warranties of title and good right to transfer.

**2.3 Additional Members.** Except as otherwise provided in the section of this agreement relating to substitution, additional Members of the Company may be admitted only with the consent of all Members and by the Joinder Agreement in *Schedule B: Joinder Agreement*.

**2.4 Additional Contributions.** Except as otherwise provided in the Act, no Member will be required to contribute additional capital to the Company. Additional capital contributions to the Company may be made by the Members only with the Members' unanimous approval. If the Members approve additional capital contributions, the Members must set a maximum amount for such contributions that will be accepted from the Members. Each Member will then have the right, but not the obligation, to contribute a pro-rata share of the maximum based upon the Member's Ownership Interest. If any Member elects to contribute less than the Member's pro-rata share of the maximum, the other Members may contribute the difference on a pro-rata basis in accordance with their Ownership Interests or on any other basis they may agree upon.

**2.5 No Interest on Capital Contributions.** No interest will be paid on capital contributions.

**2.6 Capital Accounts.** An individual capital account will be maintained for each Member. A Member's capital account will be credited with all capital contributions made by the Member and with all income and gain (including any income exempt from federal income tax allocated to the Member. A Member's capital account will be charged with the amount of all distributions made to the Member and with all losses and deductions (including deductions attributable to tax-exempt income) allocated to the Member. Members' capital accounts must be maintained in accordance with the federal income tax accounting principles prescribed in Treasury Regulations §1.704-1(b)(2)(iv).

**2.7 Third Party Loans.** In the event that the LLC requires additional funds to carry out its purposes, conduct its business or meet its obligations, or to make any expenditure authorized by this Agreement, the LLC may borrow funds from such third party lender(s) on such terms and conditions as may be acceptable to the Managers.

**2.8 Voluntary Loans.** In the event the LLC requires additional funds to carry out its purposes, conduct its business, meet its obligations or make any expenditure authorized by this

Agreement, and additional funds are not available from third parties pursuant to Section 2.7 on terms acceptable to the Managers in their sole discretion, any Member may, but shall not be obligated to, a loan such funds to the LLC. Any loan made pursuant to this Section 2.8 (a "Voluntary Loan") shall be nonrecourse to the Members; shall be evidenced by a promissory note; shall not violate the LLC's other loan or contractual arrangements; shall bear interest, shall be on such terms and conditions and repaid as the Managers shall determine. Voluntary loans may be made prior to and/or given priority to prior third-party loans and upon such terms and conditions as the Managers shall unanimously approve in writing.

### **3. ALLOCATION OF PROFITS AND LOSSES**

**3.1 Determination.** The net profit or net loss of the Company for each fiscal year will be determined according to the accounting principles employed in the preparation of the Company's federal income tax information return for that fiscal year. In computing net profit or net loss for purposes of allocation among the Members, no special provision will be made for tax-exempt or partially tax-exempt income of the Company, and all items of the Company's income, gain, loss, or deduction required to be separately stated under IRC §703(a)(1) will be included in the net profit or net loss of the Company.

**3.2 Allocation of Net Profits and Net Losses.** The net profit or net loss of the Company for a fiscal year will be allocated among the Members in proportion to their Ownership Interests.

**3.3 Allocations Solely for Tax Purposes.** In accordance with IRC §704(c) and the corresponding regulations, income, gain, loss, and deduction with respect to any property contributed to the capital of the Company will be allocated among the Members, solely for income tax purposes, to take into account any variation between the adjusted basis of such property for federal income tax purposes in the hands of the Company and the agreed value of such property as set forth in this agreement, or in any document entered into at the time an additional contribution is made to the Company. Any elections or other decisions relating to the allocations to be made under this section will be made by the action of the Members. The allocations to be made under this section are solely for purposes of federal, state, and local income taxes and will not affect, or in any way be taken into account in computing, any Member's capital account, the allocable share of the net profits and net losses of the Company, or right to distributions.

**3.4 Prorates.** If a Member has not been a Member during a full fiscal year of the Company, or if a Member's Ownership Interest in the Company changes during a fiscal year, the net profit or net loss for the year will be allocated to the Member based only on the period of time during which the Member was a Member or held a particular Ownership Interest. In determining a Member's share of the net profit or net loss for a fiscal year, the Members may allocate the net profit or net loss ratably on a daily basis using the Company's usual method of accounting. Alternatively, the Members may separate the Company's fiscal year into two or more segments and allocate the net profits or net losses for each segment among the persons who were Members, or who held particular Ownership Interests, during each segment based upon their Ownership Interests during that segment.

### **4. DISTRIBUTIONS**

**4.1 Distributions to Pay Taxes.** To enable the Members to pay taxes on income of the Company that is taxable to the Members, the Company must make cash distributions to the Members. During each fiscal year, the Company must distribute an amount equal to the product of (a) the highest aggregate rate of federal, state, and local income and self-employment tax imposed on the Company's income for that fiscal year (taking into account the deductibility of state and local income taxes for federal income tax purposes) allocated to any Member who was a Member for the full fiscal year times (b) the amount of the taxable income of the Company allocated to all Members for that fiscal year. Distributions must be paid at least quarterly during each fiscal year at times that coincide with the Members' payment of estimated taxes, and the amount of each distribution will be based upon the anticipated taxable income of the Company for the fiscal year of the distribution and the anticipated tax rates of Members, as determined at the time the distribution is made. The Company's obligation to make distributions under this section is subject to the restrictions governing distributions under the Act.

**4.2 Additional Distributions.** Subject to the restrictions governing distributions under the Act, additional distributions of cash or property may be made from time to time by the Company to the Members, at such times and in such amounts as the Members determine.

**4.3 Allocation of Distributions.** All distributions to pay taxes and additional distributions must be made to Members in proportion to their Ownership Interests.

## **5. ADMINISTRATION OF COMPANY BUSINESS**

**5.1 Management.** All Managers have the right to participate in the management and conduct of the Company's business. Subject to the limitations imposed by this agreement or by the action of the Members, each Manager is an agent of the Company and has the authority to bind the Company in the ordinary course of the Company's business. For the purposes of this Agreement, the Company's business shall be listed as: CULTIVATION

**5.2 Actions by Members.** Except as otherwise provided in this agreement, all decisions requiring action of the Members or relating to the business or affairs of the Company will be decided by the affirmative vote or consent of Members holding a majority of the Ownership Interests. Members may act with or without a meeting, and any Member may participate in any meeting by written proxy or by any means of communication reasonable under the circumstances.

**5.3 Approval of Other Members Required.** In addition to the other actions requiring Member approval under the terms of this agreement, Managers have the authority to do any of the following without the prior written consent of all other Members:

**5.3.1** To sell, lease, exchange, mortgage, pledge, or otherwise transfer or dispose of all or substantially all of the property or assets of the Company;

**5.3.2** To merge the Company with any other entity;

**5.3.3** To amend the articles of organization of the Company or this agreement;

**5.3.4** To incur indebtedness by the Company other than in the ordinary course of business;

**5.3.5** To authorize a transaction involving an actual or potential conflict of interest between a Member and the Company;

**5.3.6** To change the nature of the business of the Company; or

**5.3.7** To commence a voluntary bankruptcy case for the Company.

**5.4 Devotion of Time; Outside Activities.** Each of the Members must devote so much time and attention to the business of the Company as the Members agree is appropriate. Members may engage in business and investment activities outside the Company, and neither the Company nor the other Members have any rights to the property, profits, or benefits of such activities. But no Member may, without the consent of all other Members, enter into any business or investment activity that is competitive with the business of the Company or use any property or assets of the Company other than for the operation of the Company's business. For this purpose, the property and assets of the Company include, without limitation, information developed for the Company, opportunities offered to the Company, and other information or opportunities entrusted to a Member as a result of being a Member of the Company.

**5.5 Compensation and Reimbursement.** Members who render services to the Company are entitled to such compensation as may be agreed upon by the Members from time to time. Any compensation paid to a Member for services rendered will be treated as an expense of the Company and a guaranteed payment within the meaning of IRC §707(c), and the amount of the compensation will not be charged against the share of profits of the Company that would otherwise be allocated to the Member. Members are also entitled to reimbursement from the Company for reasonable expenses incurred on behalf of the Company, including expenses incurred in the formation, dissolution, and liquidation of the Company.

**5.6 Self Interest.** A Member does not violate any duty or obligation to the Company merely as a result of engaging in conduct that furthers the interest of the Member. A Member may lend money or transact other business with the Company, and, in this case, the rights and obligations of the Member will be the same as those of a person who is not a Member, so long as the loan or other transaction has been approved or ratified by the Members. Unless otherwise provided by applicable law, a Member with a financial interest in the outcome of a particular action is nevertheless entitled to vote on such action.

## **6. ACCOUNTING AND RECORDS**

**6.1 Books of Account.** The Members must keep such books and records relating to the operation of the Company as are appropriate and adequate for the Company's business and for the carrying out of this agreement. At a minimum, the following must be maintained at the principal office of the Company: (a) financial statements for the three most recent fiscal years; (b) federal, state, and local income tax returns for the three most recent fiscal years; (c) a Register showing the current names and addresses of the Members; (d) a copy of the Company's articles of organization and any amendments thereto; (e) this agreement and any amendments thereto; (f) minutes of any meetings of Members; and (g) consents to action by Members. Each Member will have access to all such books and records at all times.

**6.2 Fiscal Year.** The fiscal year of the Company will be the calendar year.



**6.3 Accounting Reports.** Within 90 days after the close of each fiscal year, Company must deliver to each Member an unaudited report of the activities of the Company for the preceding fiscal year, including a copy of a balance sheet of the Company as of the end of the year and a profit and loss statement for the year.

**6.4 Tax Returns.** The Company must prepare and file on a timely basis all required federal, state, and local income tax and other tax returns. Within ninety (90) days after the end of each fiscal year, the Company must deliver to each Member a Schedule K-1, showing the amounts of any distributions, contributions, income, gain, loss, deductions, or credits allocated to the Member during the fiscal year.

**6.5 Tax Matters Partner.** The Members must designate one of the Members as the tax matters partner of the Company in accordance with IRC §6231(a)(7) and keep such designation in effect at all times. The Company's Tax Matters Partner is Jeff Similien.

**6.6 Taxation as Partnership.** The Managers shall make any and all elections and take any and all other actions necessary to cause the Company to be taxed as a partnership under the Code. Notwithstanding the use of officers or other corporate positions or terminology herein shall be construed as an election on the part of the LLC to be taxed like a corporation. In the event that the Company's counsel or accountants advise that, as a result of any change in applicable laws or regulations, or administrative or judicial interpretations thereof, or otherwise, it is necessary or desirable to amend the terms of this Agreement or of the Articles of Organization in order to preserve or protect the Company's treatment as a partnership for tax purposes, then the Managers shall make such amendments to this Agreement or the Articles of Organization, as the case may be, that preserve and protect such partnership status, and which secondarily preserve the economic arrangement among the parties to the greatest extent possible, and which preserve the management structure of the Company to the greatest extent possible; and all Managers shall agree to vote for and approve any such amendments.

## **7. DISSOCIATION AND DISSOLUTION**

**7.1 Withdrawal.** A Member may withdraw from the Company only after giving notice of withdrawal to the other Members at least ninety (90) days prior to the effective date of the withdrawal.

**7.2 Expulsion.** A Member may be expelled from the Company by an affirmative vote of the Members holding a majority of the Ownership Interests held by Members other than the expelled Member if the expelled Member has been guilty of wrongful conduct that adversely and materially affects the business or affairs of the Company, or the expelled Member has willfully or persistently committed a material breach of the articles of organization of the Company or this agreement or has otherwise breached a duty owed to the Company or to the other Members to the extent that it is not reasonably practicable to carry on the business or affairs of the Company with that Member. The right to expel a Member under the provisions of this section does not limit or adversely affect any right or power of the Company or the other Members to recover any damages from the expelled Member or to pursue other remedies permitted under applicable law or in equity. In addition to any other remedies, the Company or the other Members may offset any such damages against any

amounts otherwise distributable or payable to the expelled Member.

**7.3 Events of Dissolution.** Except as otherwise provided in this agreement, the Company will dissolve upon the earliest of: (a) the death, mental incompetence, withdrawal, expulsion, bankruptcy, or dissolution of all Members; (b) approval of a dissolution of the Company by majority consent of the Members; or (c) at such time as the Company has no members.

**7.4 Effect of Member's Dissociation.** Within one hundred & twenty (120) days following the death, permanent disability, mental incompetence, withdrawal, expulsion, bankruptcy, or dissolution of a Member, the other Members (whether one or more) may elect to continue the Company by themselves or with others, and to cause the Company to purchase the interest of the dissociating Member pursuant to the provisions of the sections of this agreement relating to purchase price and payment for member's interest. Making the election is in the sole discretion of the other Members and requires the consent of other Members holding a majority of the Ownership Interests held by the other Members. Notice of the election must be given in writing to the dissociating Member or the dissociating Member's successor in interest promptly after the election is made. If the other Members do not so elect, the Company will be dissolved.

**7.5 Purchase Price.** If the other Members elect to cause the Company to purchase the interest of a dissociating Member under the section of this agreement relating to the effect of member's dissociation, the purchase price of the dissociating Member's interest in the Company will be determined by agreement between the other Members (acting by vote) and the dissociating Member. If an agreement on the purchase price is not reached within 30 days following the election to purchase the interest of the dissociating Member, the interest must be valued by a third party appraiser selected by the other Members who are reasonably acceptable to the dissociating Member and the purchase price will be the value determined in that appraisal. In appraising the interest to be purchased, the appraiser must determine the fair market value of the interest as of the date of the event of dissociation. In determining the value, the appraiser must consider the greater of the liquidation value of the Company or the value of the Company based upon a sale of the Company as a valid concern. The appraiser must also consider appropriate minority interest, lack of marketability, and other discounts. If the appraisal is not completed within 120 days following the election to purchase the interest of the dissociating Member, either the other Members or the dissociating Member may apply to a court of competent jurisdiction for the appointment of another appraiser, in which case the court-appointed appraiser must appraise the interest of the dissociating Member in accordance with the standards set forth in this section, and the purchase price will be the value determined in that appraisal.

**7.6 Payment for Member's Interest.** The purchase price for the interest of a Member purchased under the section of this agreement relating to the effect of member's dissociation will be paid as follows:

**7.6.1** The purchase price will bear interest from the date of the election of the other Members to purchase the dissociating Member's interest at the prime rate of interest in effect on the date of the election as quoted in The Wall Street Journal or, if that publication is not available, another reputable national publication selected by the other Members that are

reasonably acceptable to the dissociating Member.

**7.6.2** The purchase price will be payable in accordance with the terms of a promissory note of the Company providing for the payment of the principal amount in 60 equal monthly installments, including interest on the unpaid balance, with the first installment to be due one month after the date of closing and an additional installment to be due on the same day of each month thereafter until the promissory note is paid in full. The promissory note will bear interest from the date of the closing at the rate specified above. The promissory note must provide that if any installment is not paid when due, the holder may declare the entire remaining balance, together with all accrued interest, immediately due and payable. Partial or complete prepayment of the remaining balance due under the promissory note will be permitted at any time without penalty, provided that any partial prepayment will not affect the amount or regularity of payments coming due thereafter.

**7.6.3** The purchase must be closed within thirty (30) days following the determination of the purchase price. At the closing, the dissociating Member must sign and deliver to the Company a written assignment transferring the entire interest of the dissociating Member in the Company to the Company free and clear of all encumbrances. Such assignment must contain warranties of title and good right to transfer. At the closing, the Company must pay the accrued interest on the purchase price then due to the dissociating Member, and the Company must also deliver its promissory note to the dissociating Member. Each of the other Members must sign and deliver to the dissociating Member a security agreement granting a security interest to the dissociating Member in that percentage of the interest of each of the other Members in the Company equal to the Ownership Interest of the dissociating Member being purchased by the Company. These security agreement must be in a form reasonably acceptable to the attorney for the dissociating Member and will secure payment of the promissory note by the Company. The security agreement must provide that if there is a default in the payment of the promissory note by the Company and the security interest is foreclosed or the interest in the Company is retained by the secured party in satisfaction of the indebtedness, the interest may be transferred without the necessity of tendering the interest to the Company under the section of this agreement relating to tender of interest and the person acquiring the interest in the Company will be admitted as a member of the Company without further consent of the Members being required.

*As an example of the operation of this provision, if the Ownership Interest of a dissociating Member was 25% and there are three (3) other Members, each with an Ownership Interest of 25% before the EXIT of the dissociating Member, then each of the other Members would be granted a security interest in an Ownership Interest of  $8\frac{1}{3}\%$  ( $25\% / 3$  members). The total Ownership Interest of all remaining Members would be  $33\frac{1}{3}\%$  after the purchase of the dissociating Member's Ownership Interest by the Company.*

**7.7** Effect of Purchase of Member's Interest. A dissociating Member will cease to be a Member upon the election of the other Members to cause the Company to purchase the dissociating Member's interest pursuant to the section of this agreement relating to the effect of member's dissociation. Thereafter, the dissociating Member will have no rights as a Member in the Company, except the right to have the dissociating Member's interest

purchased in accordance with the terms of this agreement.

**7.8 Successor in Interest.** For purposes of this section relating to dissociation and dissolution, the term “dissociating Member” includes the dissociating Member’s successor in interest.

**7.9 Buy/Sell Provisions.** Managers may execute a Buy/Sell Agreement which shall be attached as Schedule C, the terms of which shall be incorporated herein by reference.

## **8. WINDING UP AND LIQUIDATION**

**8.1 Liquidation Upon Dissolution.** Upon the dissolution of the Company, the Members must wind up the affairs of the Company unless the dissolution results from the dissociation of a Member and the other Members elect to continue the Company under the provisions of this agreement relating to the effect of member’s dissociation. If the affairs of the Company are wound up, a full account must be taken of the assets and liabilities of the Company, and the assets of the Company must be promptly liquidated. Following the liquidation of the assets of the Company, the proceeds must be applied and distributed in the following order of priority:

**8.1.1** To creditors of the Company in satisfaction of liabilities and obligations of the Company, including, to the extent permitted by law, liabilities, and obligations owed to Members as creditors (except liabilities for unpaid distributions);

**8.1.2** To any reserves set up for contingent or unliquidated liabilities or obligations of the Company deemed reasonably necessary by the Members, which reserves may be paid over to an escrow agent by the Members to be held by such escrow agent for disbursement in satisfaction of the liabilities and obligations of the Company, with any excess being distributed to the Members as provided below; and

**8.1.3** To Members in proportion to the positive balances of their capital accounts, after taking into account all adjustments made to capital accounts for the fiscal year during which the distributions to Members are made.

**8.2 Distribution of Property in Kind.** With the approval of the Members, the property of the Company may be distributed in kind in the process of winding up and liquidation. Any property distributed in kind will be valued and treated for the Company’s accounting purposes, in accordance with Treasury Regulations §1.704-1(b)(2)(iv)(e)(1), as though the property distributed had been sold at fair market value on the date of distribution. If the property is distributed in kind, the difference between the fair market value of the property and its adjusted tax basis will, solely for the Company’s accounting purposes and to adjust the Members’ capital accounts, be treated as a gain or loss on the sale of the property and will be credited or charged to the Members’ capital accounts in the manner specified in the section of this agreement relating to capital accounts.

**8.3 Negative Capital Accounts.** If any Member has a negative balance in the Member’s capital account upon liquidation of the Company, the Member will have no obligation to make any contribution to the capital of the Company to make up the deficit, and the deficit will not be considered a debt owed to the Company or any other person for any purpose.

## **9. TRANSFER OF MEMBERS’ INTERESTS**

**9.1 General Restrictions.** No Member may transfer all or any part of such Member’s interest as

a member of the Company except as permitted in this agreement. Any purported transfer of an interest or a part of an interest in violation of the terms of this agreement will be null and void and of no effect. For purposes of this section a “transfer” includes a sale, exchange, pledge, or other disposition, voluntarily or by operation of law.

**9.2 Permitted Transfers.** A Member may transfer all or a part of the Member's interest in the Company with the prior written consent of the majority of all Members. If the Members do not consent to a particular transfer, the Member may transfer all or a part of the Member's interest if such interest or part has been tendered for sale to the Company in accordance with the section of this agreement relating to tender of interest, the tender has not been accepted within the time limit set forth in that section, the transfer is made to the transferee named in the notice of tender within 180 days after the notice of tender is effective, and the transfer is at a price and upon terms no more favorable to the transferee than those set forth in the notice of tender.

**9.3 Tender of Interest.** If a Member wishes to transfer all or part of the Member's interest in the Company and the other Members do not consent, the interest or the part to be transferred must be tendered to the Company by giving written notice of such tender to the Company. Such notice must contain the name and address of the proposed transferee, the price to be paid by the proposed transferee for the interest, if any, and the terms of the proposed transfer. If a Member's interest is transferred by operation of law, the successor in interest to the transferring Member may give the required notice of tender to the Company at any time following the transfer, and such successor in interest will be deemed to have given the notice of tender at the time any other Member gives notice to the successor in interest and to all other Members of the failure to give the notice of tender. Within 30 days after a notice of tender is given, the other Members may accept the tender on behalf of the Company and have the Company purchase the interest tendered for the lesser of the price set forth in the notice of Tender (if the proposed transfer is to be by sale) or the price applicable to the purchase of a Member's interest pursuant to the section of this agreement relating to the effect of member's dissociation. The tender must be accepted on behalf of the Company by giving notice of acceptance to the transferring Member or the transferring Member's successor in interest. The purchase may, at the option of the other Members, be on the terms set forth in the notice of tender, if any, or the terms set forth in the section of this agreement relating to payment for member's interest. For purposes of those provisions, the date of the acceptance of tender will be deemed to be the date on which the other Members elected to purchase the interest of a dissociating Member.

**9.4 Effect of Tender.** The Member tendering the interest will cease to be a Member with respect to the tendered interest upon acceptance of the tender by the Company. Thereafter, the Member tendering the interest will have no rights as a Member in the Company, except the right to have the tendered interest purchased in accordance with the terms of this agreement.

**9.5 Substitution.** If the interest of a Member is transferred, the transferee of the interest may be admitted as a Member of the Company if the transferee executes and delivers to the Company a written agreement to be bound by all of the terms and provisions of this agreement. But the transferee is entitled to be admitted as a Member only if all of the other Members consent to the admission of the transferee as a Member, and this consent may be withheld reasonably or unreasonably. If a Member who is the only member of the Company transfers the Member's

entire interest, the transferee will be admitted as a Member of the Company effective upon the transfer without the requirement of an agreement to be bound by this agreement or consent. If the transferee is not admitted as a Member, the transferee will have the right only to receive, to the extent assigned, the distributions from the Company to which the transferor would be entitled. Such transferee will not have the right to exercise the rights of a Member, including, without limitation, the right to vote or inspect or obtain records of the Company.

## **10. INDEMNIFICATION AND LIABILITY LIMITATION**

**10.1 Indemnification.** Except as otherwise provided in this section, the Company must indemnify each of the Members to the fullest extent permissible under the law of the state in which the articles of organization of the Company have been filed, as the same exists or may hereafter be amended, against all liability, loss, and costs (including, without limitation, attorneys' fees) incurred or suffered by the Member by reason of or arising from the fact that the Member is or was a member of the Company, or is or was serving at the request of the Company as a manager, member, director, officer, partner, trustee, employee, or agent of another foreign or domestic limited liability company, corporation, partnership, joint venture, trust, benefit plan, or other enterprises. The Company may, by the action of the Members, provide indemnification to employees and agents of the Company who are not Members. The indemnification provided in this section is not exclusive of any other rights to which any person may be entitled under any statute, agreement, resolution of Members, contract, or otherwise. But despite any other provision of this agreement, the Company has no obligation to indemnify a Member for:

**10.1.1** Any breach of the Member's duty of loyalty to the Company;

**10.1.2** Acts or omissions not in good faith that involve intentional misconduct or a knowing violation of law;

**10.1.3** Any unlawful distribution under the Act; or

**10.1.4** Any transaction in which the Member derives improper personal benefit.

**10.2 Limitation of Liability.** No Member of the Company is liable to the Company or to the other Members for monetary damages resulting from the Member's conduct as a Member except to the extent that the Act, as it now exists or may be amended in the future, prohibits the elimination or limitation of liability of members of limited liability companies. No repeal or amendment of this section or of the Act will adversely affect any right or protection of a Member for actions or omissions prior to the repeal or amendment.

## **11. LEGAL REPRESENTATIVES & SUCCESSORS**

**11.1 Legal Representative.** In the event of the Manager, Jeff Similien's disability as determined by a physician, the Legal Representative who shall assume all his duties and responsibilities of the LLC shall be Laura Similien. The Legal Representative shall assume all duties until the full recovery of the Member and/or pre-determined designated time. During this period, the Legal Representative shall be indemnified against all losses incurred for the LLC.

**11.2. Successors.** Upon the death of the Member Jeff Similien, the LLC is not to terminate, and shall immediately be transferred to the successor, Laura Similien and reconstituted and reformed on all the applicable terms, conditions, and provisions of this Agreement.

## **12. MISCELLANEOUS PROVISIONS**

**12.1 Meetings of the Managers & Advisory Board.** The Managers shall meet annually in the first week of February of the fiscal year with the Advisory Board consisting of Attorney, Accountant and any other agreed upon Board member, at such times as agreed in writing. Managers may be present in person, by telephone, internet phone, or other media. At such meetings, the Managers shall review the applicability of the terms of this Agreement, and other corporate documents, including but not limited to: life insurance policies, disability policies, respective Ownership interests of the Members, financial solvency and any all other items that either Manager desire.

**12.2 Amendment.** The Members may amend or repeal all or part of this agreement by unanimous written agreement. This agreement may not be amended or repealed by the oral agreement of the Members.

**12.3 Binding Effect.** The provisions of this agreement will be binding upon and will inure to the benefit of the heirs, personal representatives, successors, and assigns of the Members. But this section may not be construed as a modification of any restriction on transfer set forth in this agreement.

**12.4 Notice.** Except as otherwise provided in other sections of this agreement, any notice or other communication required or permitted to be given under this agreement must be in writing and must be mailed by certified mail, return receipt requested, with postage prepaid. Notices addressed to a Member must be addressed to the Member's address listed in the section of this agreement relating to initial members, or if there is no such address listed for a Member, the address of the Member shown on the records of the Company. Notices addressed to the company must be addressed to its principal office. The address of a Member of the Company to which notices or other communications are to be mailed may be changed from time to time by the Member's or the Company's giving written notice to the other Members and the Company. All notices and other communications will be deemed to be given at the expiration of three days after the date of mailing.

**12.5 Litigation Expense.** If any legal proceeding is commenced for the purpose of interpreting or enforcing any provision of this agreement, including any proceeding in the United States Bankruptcy Court, the prevailing party in such proceeding will be entitled to recover a reasonable attorney's fee in such proceeding, or any appeal thereof, to be set by the court without the necessity of hearing testimony or receiving evidence, in addition to the costs and disbursements allowed by law.

**12.6 Additional Documents.** Each Member must execute such additional documents and take

such actions as are reasonably requested by the other Members in order to complete or confirm the transactions contemplated by this agreement.

**12.7 Counterparts.** This agreement may be executed in two or more counterparts, which together will constitute one agreement.

**12.8 Governing Law.** This agreement will be governed by the law of the Commonwealth of Massachusetts in which the articles of organization of the Company has been filed.

**12.9 Severability.** If any provision of this agreement is invalid or unenforceable, it will not affect the remaining provisions.

**12.10 Third-Party Beneficiaries.** The provisions of this agreement are intended solely for the benefit of the Members and create no rights or obligations enforceable by any third party, including creditors of the Company, except as otherwise provided by applicable law.

**12.11 Authority.** Each individual executing this agreement on behalf of a corporation or other entity warrants that he or she is authorized to do so and that this agreement constitutes a legally binding obligation of the corporation or other entity that the individual represents.

**12.12 Counsel.** This agreement has been drafted by (the "Attorney"), who represents in connection with the creation of the Company. and each understands that the Attorney can represent only one party in connection with this matter, that the Attorney represents and does not represent them, and that they have been advised by the Attorney that they should retain attorneys of their own choice in connection with this matter.

(Signature Page follows)




IN WITNESS WHEREOF, the parties hereto have executed this Agreement under seal as of the day and year first above written.

Lowkey Cultivation, LLC

Jeff Similien

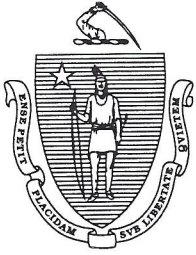
Manager



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**SCHEDULE A TO OPERATING AGREEMENT OF  
LOWKEY CULTIVATION, LLC  
CAPITAL CONTRIBUTION**

Name of Member:	Membership Interest:	Capital Contribution:
Jeff Similien	100%	\$568,000
Total:	100%	\$568,000



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

William Francis Galvin  
Secretary of the  
Commonwealth

September 1, 2022

TO WHOM IT MAY CONCERN:

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

**LOWKEY CULTIVATION LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 7, 2021**.

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

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

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

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



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



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

mass.gov/dor

Letter ID: L1603582912  
Notice Date: September 28, 2022  
Case ID: 0-001-721-243



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



LOWKEY CULTIVATION, LLC  
54 WALTER ST  
HYDE PARK MA 02136-2972

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

The Commissioner of Revenue certifies that, as of the date of this certificate, LOWKEY CULTIVATION, LLC is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

**This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.**

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

### ***Visit us online!***

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



August 23, 2022

Dear CCC,

Edmond Felix is retained as Lowkey Cultivation LLC's CFO. He doesn't qualify as a close associate under 935 CMR 500.002. Lowkey Cultivation LLC has retained the services of Viridity Staffing (Brett Clancy), Linda Wakefield assist Lowey Dispensary during their licensing and hiring processes.

Thank you for your time,

A handwritten signature in black ink, appearing to be "Jm Gu", is written over a horizontal line.





85 B East Central St, Suite A, Natick MA 01760  
617-500-1824 [www.budrisk.com](http://www.budrisk.com)

Cannabis Control Commission  
Union Station,  
2 Washington Square,  
Worcester, MA 01604

RE: Lowkey Cultivation LLC (Cultivation

Please be informed that the above referenced applicant has made formal application through our general brokerage for general liability and product liability insurance with minimum limits of \$1,000,000 per occurrence, and \$2,000,000 annual aggregate, and application for additional excess liability limits. In accordance with 935 CMR 500.101(1); 935 CMR 500.105(10), the deductible for each policy can be no higher than \$5,000 per occurrence. The below underwriters have received this application and are expecting to provide proposals within the coming weeks. Lowkey Cultivation LLC has purchased a bond through our brokerage with a bond limit in compliance with the Commission's request. We look forward to providing liability coverage to Lowkey Cultivation LLC as soon as a bindable proposal is available.

Quadscore Insurance Services  
Cannasure Insurance Services, Inc.  
Next Wave Insurance Services LLC  
Canopius US Insurance Company  
United Specialty Insurance Company

Best Regards,

DocuSigned by:

A blue ink signature of James Boynton, written in a cursive script.

F5081B2D6DCB4CB...

James Boynton

Managing Broker

MA Insurance License #1842496

[jim@budrisk.com](mailto:jim@budrisk.com)



**LOWKEY Cultivation**  
Cannabis Cultivation

Jeff Similien  
Founder & CEO  
[Jeff@lowkeydispensary.com](mailto:Jeff@lowkeydispensary.com)  
(617) 894-2266



2022

# BUSINESS PLAN

CANNABIS CULTIVATION

**Updated**  
August 26 2022

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# EXECUTIVE SUMMARY

## MANAGEMENT TEAM

Jeff Similien CEO

Felix Edmond CFO

## KEY ADVISORS/BOARD MEMBERS

Sania Santos, ESQ

## EMPLOYEES

60

## FINANCIAL SUMMARY

Capital Raised: \$3,000,000.00

**FINANCINGSOUGHT:\$ 3,000,000.00**

## INDUSTRY

Cannabis Cultivation

## USE OF FUNDS

Facility Build out: \$2,000,000.00

Operating Capital: \$1,000,000.00

## BUSINESS MODEL AND CUSTOMERS

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Lowkey is a cannabis cultivation company /brand in Boston with 2 retail stores and cultivation all in Boston MA, Our goal is to work with communities that have been disproportionately harmed by the past prohibition of cannabis to ensure their inclusion in the legal cannabis industry. Our long-term Goal: Is to be a fully integrated company that cultivates, processes, & delivers to our retail stores and retail partners. Our focus is on community building; aside from providing jobs to our employees we also want to educate them on financial literacy and homeownership by offering educational programs and on-site professionals to assist them through the process.



## BUSINESS SUMMARY

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Provide craft cannabis flower to the Boston Market.



## PROBLEM & SOLUTION

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Cannabis is being produced on a large scale currently. We tend to focus on a micro grow site.



## PRODUCTS AND SERVICES

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LowKey Cultivation will focus on organic growth cultivating premium flower.



**Lowkey Cultivation is a cannabis brand and Cultivator that focus on cultivating crafted cannabis flower.**

## COMPETITION

---

Currently, there are 130 pending applications in the state of Massachusetts hoping to get a license to operate a legal dispensary. Many of those applicants are planning to open in Eastern Massachusetts.





# COMPANY SUMMARY

LowKey Cultivation/Dispensary is a cannabis brand in Boston with 2 retail stores and cultivation all in Boston MA, Our goal is to work with communities that have been disproportionately harmed by the past prohibition of cannabis to ensure their inclusion in the legal cannabis industry. Our long-term Goal: Is to be a fully integrated company that cultivates, processes, & delivers to our retail stores and retail partners.

**Company Background:** As Boston's first cannabis cultivator—set to start in 2023 in the Hyde Park neighborhood—it's our responsibility to bring unbelievable buds to Boston by growing high-quality craft cannabis and providing customers with the most exclusive product in the city. We've scoured the country for highly sought-after strains, networked with some of the industry's leading cannabis cultivation professionals, and utilized the most advanced grow tech available, all to bring Boston the best cannabis on the market.

**Our long-term Goal:** Cultivate high-quality craft cannabis that everyone from the inexperienced to the connoisseur will enjoy, level-up our communities, and elevate cannabis experiences for LowKey adult-use customers by producing exclusive craft flower and product, empowering and employing underrepresented citizens, drawing inspiration from our environment, and breathing life into Boston.

**Management Team:** Our team has over a decade of experience in business management and aims to build strong relationships and strategic partnerships with existing national entities to oversee the operations.

**Location:** We currently hold a Provisional License at 571B Washington Street Dorchester, MA. 02522 Washington st West Roxbury.

**Mission Statement:** A Boston and beyond where underrepresented voices are elevated, quality cannabis drives equitable community benefits, local culture is embraced, and high-quality, craft cannabis is cultivated with care. #LevelUp

A Boston known far and wide for high-quality, exclusive craft cannabis produced by LowKey Cultivation's industry-leading team—made up of local community members—in their advanced grow facility.

# Business Overview

**MANAGEMENT:** is the process of planning, organizing, leading, and controlling an organization's human, financial, physical, and information resources to achieve organizational goals in an efficient and effective manner.



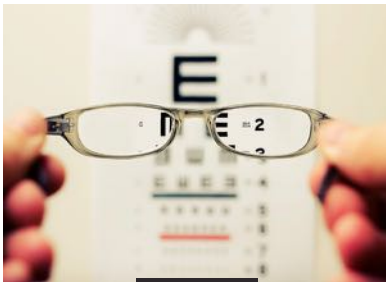
## Develop multifaceted Cannabis Company in three phases:

**Phase I:** Enter the market place as a dispensary in Dorchester. LowKey will execute 12 months of profitability

**Phase II:** Apply for Dispensary license number 2 & 3

**Phase III:** Apply for Cultivation License

### VISION



Our vision is to build a successful company by focusing on capturing Market share.

### MISSION



Our mission is to create a professional, cannabis friendly environment where customers and employees feel appreciated and welcome.

### GOAL



Be fully integrated cannabis company in Massachusetts.

**COMPANY BACKGROUND:** LowKey is a Limited Liability Company led by Founder/CEO Jeff Similien. Jeff has assembled an administrative team that is committed to setting the standard in the Massachusetts's cannabis market.

#### **PARTNERSHIPS:**

Our team is committed to establish strategic industry relationships.

#### **MARKET:**

It is estimated that nearly 700,000 Massachusetts residents are potentially interested in the use of recreational cannabis, and the adult-use cannabis. The Massachusetts market is projected to become a \$16 billion industry by 2020.



## PRODUCTS & SERVICES

Lowkey Cultivation will offer a wide range of cannabis strains specific to the demand of the Massachusetts Market.

With approved licensing Lowkey Dispensary will provide:

**Dorchester Diesel**

\_\_\_\_\_

**Hyde Park  
Haze**

\_\_\_\_\_

**Raiders Breath**

\_\_\_\_\_

.....  
**Blue Hill  
Dreams**

\_\_\_\_\_

**Sixmill OG**

\_\_\_\_\_

**Shimmy Kush**

\_\_\_\_\_

Lowkey Cultivation will ensure that all our wholesale partners are given first class treatment whenever they purchase from us. We have a CRM software that will enable us to manage a one-on-one relationship with our customers no matter how large our client base grows.

## CANNABIS MARKET IN MASSACHUSETTS



In 2008 Massachusetts voters decriminalized the possession of small amounts of cannabis and in 2012 Massachusetts became the 18th state to legalize medical cannabis through a ballot. In November 2016, Massachusetts voters approved Question 4, the initiative to legalize the recreational use of cannabis for adults 21 years of age and older. In December 2016, the Massachusetts state legislature voted to delay sales of recreational cannabis for six months. Originally, licensing for cannabis shops was set to begin in January 2018, but the delay moved the date and the first retail cannabis business opened in Massachusetts in November 2018.

In 2018, there were over 60,000 (up from 19,000 in early 2016) people who had gotten medical cannabis cards that allowed them to use medical cannabis legally to treat a variety of ailments. They were served by 47 medical cannabis dispensaries.

As of February 2019, there are over 300 pending applications, including 130 retailer, 87 cultivator, 44 manufacturer, 12 microbusiness, 11 transporter and 4 testing licenses. The review process includes a background check and a 60-day window during which the municipality in which the business hopes to locate must certify that the applicant has met all local requirements.



# THE BILLION DOLLAR OPPORTUNITY

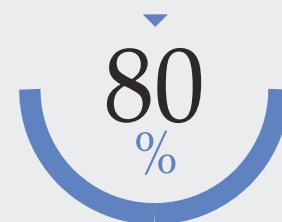
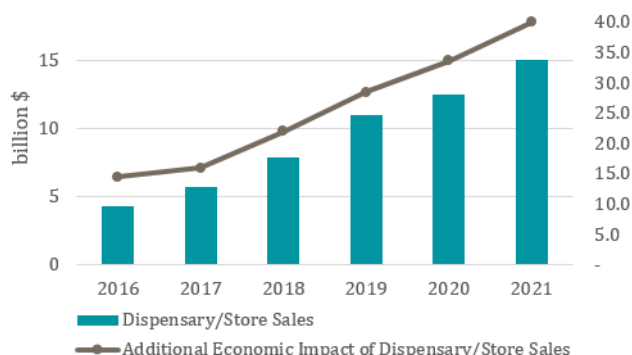
The expected growth came after a solid 2016, when recreational cannabis sales increased by 80% to reach \$1.8 billion. Colorado and Washington led the charge, while Oregon's adult-use market posted strong sales gains in its first full calendar year of operation. The industry also saw a spike in medical cannabis sales, as patient counts rose in new states and continued climbing in mature markets.

According to a BDS Analytics report, the retail sector owed \$1 billion in state taxes in 2016 and another \$1.4 billion in 2017.

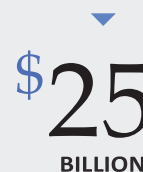
In 2017, overall cannabis sales in the United States at the retail level soared by 31.5%, hitting \$5.7 billion on the back of continued growth in existing recreational cannabis markets.

Recreational sales are expected to surpass medical this year for the first time ever. Medical cannabis sales also are expected to sustain the industry.

Figure 4. Cannabis retail industry economic impact



**In 2016, recreational cannabis sales increased by 80% to reach \$1.8 billion.**



**New Frontier projects the industry to top \$25 billion in revenue by 2025.**

The cannabis retail market is growing at a high rate in the United States alone, with there currently being over 3,000 open and operating dispensaries and retail stores throughout the country according to data from Statistic. The growing numbers of dispensaries is a large part as to why New Frontier projects the industry to top \$25 billion in revenue by 2025.

The increase in retail sales over the next five years will provide a substantial economic boost for the United States. The total economic output from legal cannabis will grow 150% from \$16 billion in 2017 to \$40 billion by 2021, according to the "US Legal Cannabis: Driving \$40 Billion Economic Output" report released by ArcView Market Research, in partnership with BDS Analytics.

The level of sophistication and involvement among investors in the cannabis industry varies quite widely, as some belong to cannabis-specific venture capital firms while others have taken a material interest in a friend or family member's cannabis business. But in general, more investors are pumping money into the cannabis industry than ever before, and they are also increasing the size of their capital placements. The average investor/investment firm involved in the cannabis industry has placed \$450,000 in cannabis companies.



## MARKET OPPORTUNITY IN EASTERN MASSACHUSETTS

There is currently a major opportunity in the Eastern Massachusetts market to open a high-end cannabis dispensary. The Eastern Massachusetts area has distinct advantages over the Springfield metropolitan area, which is why LowKey Cultivation has strategically identified the Greater Boston area as our launching point. Approximately 2/3 of the total Massachusetts population lives in Greater Boston, while Western Massachusetts has just one urban area with a good mix of rural areas and college towns. The

state is currently the most populous of the six New England states, as well as the fastest growing. The largest county in Massachusetts is Middlesex, with over 1 million residents. The median age is 39.4 years of age over the entire population of Massachusetts. The gender ratio is approximately 51.5% female and 48.5% male. The racial diversity in Massachusetts is 79.3% Caucasian, 7.3% African American, 6.1% Asian, 4.1% other races, 3% two or more races, and a small number of Native Americans.

### POPULATION



The last official census in the United States was carried out in 2010 and at the time, it was confirmed that 6,547,629 people were living in the state, which represented a rise of 3.1% over a ten-year period. Estimated figures were released in July 2015, claiming that the Massachusetts population has risen to 6,794,422, making this the 14th most populous state in the US. The population of Massachusetts has continued to climb over the last few decades, although it has been at a slower pace than most states in the West and South. The last census showed a growth of 3.9% since 2000, compared with almost 10% nationally. The state has been slowly transforming from a manufacturing-based economy into one based on technology, which leaves fewer job options for lower-skilled workers, and many residents have left the state citing high housing and living costs.

### AVERAGE INCOME



The average annual salary per person in the state of Massachusetts is \$48,229 per year. Males average \$55,502 per year, while females average \$40,776. However, those salaries jump quite significantly when LowKey Dispensary considers our targeted demographic. In the state of Massachusetts, a male with a Bachelor's degree makes \$73,399 while females make \$50,646. Males with a Graduate degree make an average of \$96,336 while females average \$65,973. This data supports why LowKey Dispensary has decided to target a more professional, middle aged crowd.

### Alternative Treatment



LowKey will offer alternative options to traditional medicines. We aim to attract all professional, progressive thinking people of Massachusetts. Many people suffer from varying degrees of stress, anxiety, and mental conditions such as depression. LowKey wants to aid in the treatment of these manageable conditions.

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## COLLEGE MARKET



Eastern Massachusetts has some of the top colleges in the country. Colleges like M.I.T, Boston College, and Harvard are just to name a few. Lowkey Cultivation feels it can market appropriately and capture an upscale demographic of college students that are of age to legally consume cannabis. These students are well educated and should appreciate a high end shopping experience. Lowkey Cultivation plans to create a specific marketing approach when attracting these college students. This demographic of students, while looking to use cannabis products, will also be more inclined to educate themselves on the different types of cannabis strains, their effects on the mind and body and how cannabis products can aid them in the daily grind of being highly competitive college students.

## RACE TO MARKET



There is a current race to market in Massachusetts. With the lack of legal options in the Eastern Massachusetts area, dispensaries who obtain licenses the fastest have the ability to establish strong market shares first. LowKey Dispensary is aiming to receive our dispensary license in 240 days. With a jump on our competitors we plan to roll out a series of aggressive marketing campaigns and unique branding strategies to penetrate the market place.

## VOLATILITY



With every new cannabis market comes short term market volatility. Emerging cannabis companies need to be positioned to handle these unique fluctuations if they wish to remain profitable over the long haul. Lowkey Dispensary is not only aware of the volatility, we are strategically prepared to capitalize on the growing pains of our new market place. Outlined below are some of the more common trends we have witnessed in other markets during the first couple years of recreational cannabis.

- Crippling compliance hurdles and penalties
- New competition flooding the market place
- Product supply meeting or exceeding demand

- Failing competition undercutting the market
- Black Market competition
- Unforeseeable political shifts

So how does a new cannabis business deal with market volatility? Experience. Lowkey Dispensary has teamed up with Alves & Santos P.C to not only prepare for the market volatility but to actually benefit from it. Alves & Santos P.C team has an industry network that exceed sixteen years of experience. Lowkey's answer to market volatility is industry experience.

# S.W.O.T. ANALYSIS

## STRENGTHS

- **Experience:** We are a team of professionals with valuable transferable skills, business acumen of leadership qualities.
- **Relationships:** We plan to leverage essential relationships to propel the business.
- **Location:** The Greater Boston metropolitan area has 2/3 of the state's populous.

**Community:** Delivering education and value to the community is key.

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## WEAKNESSES

- **High Start-up Cost:** Our Company needs capital for both the dispensary and Phase II growth.
- **Construction Time:** Is required to build out the dispensary site.
- **Town Approval:** Selecting the optimal town in the Greater Boston is extremely challenging.
- **Lack of Reputation:** Unknown entity, there is an opportunity to leverage a known brand in the industry.

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## OPPORTUNITIES

- **People:** We have an opportunity to develop and retain a best in class team.
- **Process:** We will develop a fully automated/inter-operable business.
- **Market:** The Massachusetts cannabis market is currently the most profitable in the country.
- **Growth:** The Massachusetts cannabis market is currently young and under saturated.

## THREATS

- **Cannabis Commission:** Uncertainty over Stringent regulations and compliance.
- **Competition:** Medical marijuana businesses have had a few years to acquire market share.
- **Time:** Applications are being reviewed and we desire to be first/early to market in location.

# MARKETING STRATEGY

## TARGET IMPACT

### COMMUNITY OUTREACH

Companies in the cannabis space are starting to recognize the importance of corporate citizenship and have begun looking for ways to give back to their communities. Lowkey Dispensary may make a tangible difference within our neighborhoods.

In order to reach the consumer Lowkey Dispensary plans to do the following things:

- Volunteer
- Sponsor Events and Causes
- Listen and respond to community needs
- Create new opportunities for residents

In order to build strong relationships with local citizens, Lowkey Dispensary plans to do the following:

- Create inclusion plan for employees to become home owners
- Plan community conversation events
- Provide financial literacy course/ program for employees and residents.
- Commit to Donate \$50,000 Annually to the Codman square community

### PARTNERSHIPS

Lowkey Cultivation plans on working with licensed cannabis businesses wholesalers to provide a wide array of state tested cannabis products.

### EMPLOYEE EDUCATION

Lowkey Cultivation believes knowledge is empowering and we intend on sharing our collective knowledge as a means of contributing to the culture. Our team members will be given the opportunity to train under the guidance of industry tested professionals. We will conduct regular internal training. Each team member will be encouraged to learn and teach as they climb the company ladder. We will also keep abreast of global scientific studies (triple and double-blind outcomes) that are being released.

### STRATEGY

**Strategy:** Our strategy is to Attract our customers by using seed kiosk, offer convenience system by using AlpineIQ for customer Information Acquisitions, and using Alpine IQ to retain our loyal customers.

**Tactics:** SEED is a touch screen kiosk system designed for in-store use of marijuana dispensaries. SEED allows operators more control over the shopping environment and builds a trusted connection between dispensaries and customers with any product they buy. This self-ordering system is a great educational feature that would set Lowkey Dispensary apart from the rest. The benefits are improved customer flow, larger average ticket price and increased store loyalty.

Alpine IQ provides electronic payments for industries that otherwise would not have access to legitimate merchant processing. AlpineIQ offers the convenience and security of mainstream payments without the frustrations, unreliability, and awkwardness of niche payment schemes. This system provides the security needed to overcome the risks associated with workaround payment options.

Alpine IQ develops internal tools to facilitate everything from SMS campaigns to business analytics and enterprise M&A diligence instruments. Over time we hope to give cannabis operators the flexibility and power currently only seen in blue-chip industry platforms. Our goal is to bring world-class technology to an industry ready for disruption. With Alpine IQ, we want to build something that would be innovative enough to fuel modern cannabis retail infrastructure

## MARKETING PLAN

Due to the fact that cannabis is illegal under federal law, state governments and online advertising platforms are placing strict rules on how companies can market their products.

Google, Facebook and Twitter all have advertising policies that restrict the promotion of the sale of cannabis. Google's policy prohibits ads that promote "substances that alter mental state for the purpose of recreation." Facebook restricts any "illegal, prescription, or recreational drugs." And Twitter bans "illegal drugs" as well as substances that cause "legal highs." Instagram and Facebook have decided to go a step further by removing pages of cannabis related businesses.

The most effective strategies for legal marijuana companies are direct marketing at industry conferences and other events, building communities around marijuana-related concerns such as health and wellness. The marketing and sales strategy of Lowkey Dispensary will be based on generating long-term personalized relationships with growers and manufacturers. We are working on hosting 4/5 Events per year.

## TARGET CUSTOMERS

Aside from the dispensing of cannabis products, Lowkey Dispensary will sell a wide range of cannabis infused products to customers who are based in Massachusetts and every other city where our stores will be opened.

Lowkey Cultivation will ensure that all our customers are given first class treatment whenever they visit our store. We have a CRM software (Seeds, Alpine IQ) platform that will enable us to manage a one-on-one relationship with our customers no matter how large our client base grows. We will ensure that we get our customers involved in their own personal consumption decisions to make the right choices for their unique desires and needs.

Cannabis customers come from diverse groups, ages, races and socioeconomic backgrounds. Ranging from young to old, treating chronic and terminal illnesses such as cancer, epilepsy.

## MARKETING AND ADVERTISING CAMPAIGNS INCLUDE:



### DIRECT MARKETING

- Business events and conferences
- Business and industry associations
- Brand development
- Social Media Marketing Firm



### ADVERTISING PUBLICATION

- Cannabis Now
- 420 Magazine
- Marijuana Venture
- SEnsi Magazine



### ONLINE MARKETING

- E-mail Marketing
- Social Media
- Website development with search engine optimization
  - Keywords
  - Fresh content

## CANNABIS BUSINESS DIRECTORIES

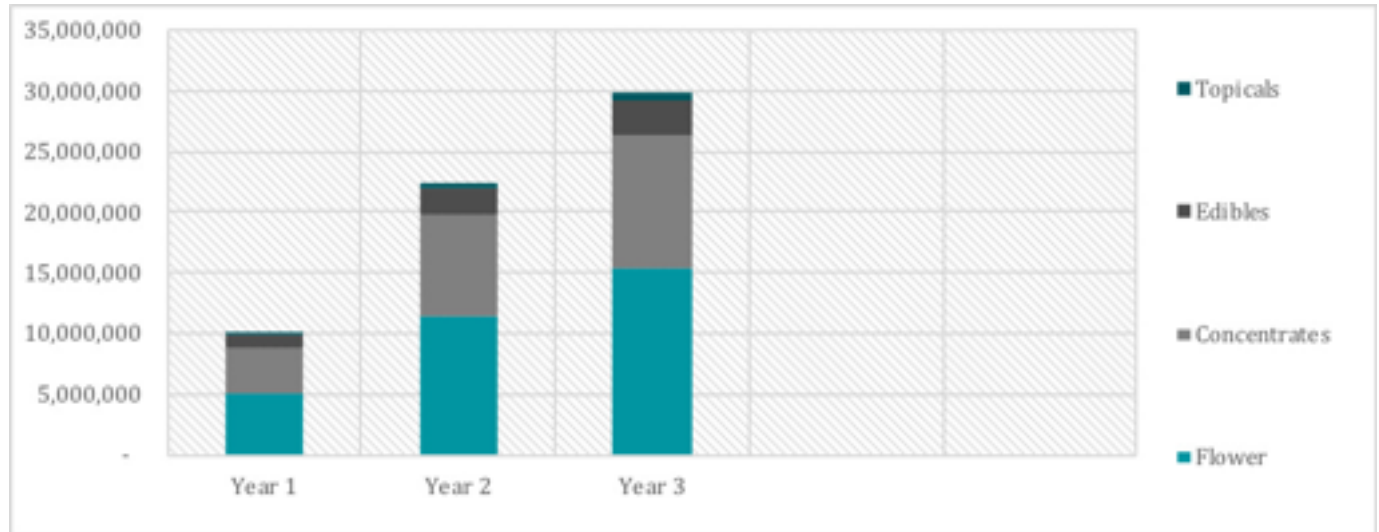
COMPANY	WEBSITE		TRAFFIC
WEEDMAPS	<a href="http://weedmaps.com">weedmaps.com</a>	Cannabis finder on the planet. With over 7,750 listings throughout the U.S., Canada, and Europe.	WeedMaps has 7.96 million total visits each month.
LEAFLY	<a href="http://leafly.com">leafly.com</a>	Leafly is a cannabis information resource for finding the right strains and products. Services include: cannabis finder, online store, branding, doctors' portal.	Leafly has 226.27 thousand total visits each month.

# SALES FORECAST

During the first year, Lowkey Dispensary intends to launch sales of the vendors' product line and it is expected to generate \$10 million in net revenue year one.

From the second year Lowkey Dispensary will generate healthy monthly day-to-day income from sales. Sales will be increasing to about \$20,000 a day within 3 years of the Store Grand Opening.

From the third year Lowkey Dispensary expects a healthy annual increase in retail revenue by virtue of multiple Massachusetts locations.



## SALES FORECAST FOR FIRST FIVE YEARS

	Year 1	Year 2	Year 3	Year 4	Year 5
Profit	\$2,131,769	\$3,270,336	\$3,174,117	\$2,585,592	\$2,153,800
Seller's Discretionary Earnings (SDE)	\$2,058,000	\$2,058,000	\$2,058,000	\$2,058,000	\$2,058,000
Depreciation	\$13,889	\$13,889	\$13,889	\$13,889	\$13,889
Working Capital	\$2,645,658	\$2,830,854	\$2,873,883	\$2,896,874	\$2,917,152
Change in Working Capital	\$0	\$185,196	\$43,029	\$22,991	\$20,278
Loans paid back	\$0	\$1,000,000	\$1,000,000	\$1,000,000	\$0
New loans taken	\$0	\$0	\$0	\$0	\$0
Free Cash Flow to Equity (FCFE)	\$4,203,658	\$4,157,029	\$4,202,977	\$3,634,490	\$4,205,411
Present Value of FCFE	\$4,203,658	\$4,157,029	\$4,202,977	\$3,634,490	\$4,205,411
Total Present Value of FCFE	\$20,403,564				
Terminal Value					\$15,941,816
Present Value of Terminal Value	\$9,898,613				
Non-operating assets					
<b>Business Value</b>	<b>\$30,300,000</b>				



# OPERATING PLAN

## CANNABIS CULTIVATION LOCATION AND SECURITY

### LOCATION AND BUILDING SPECIFICATIONS



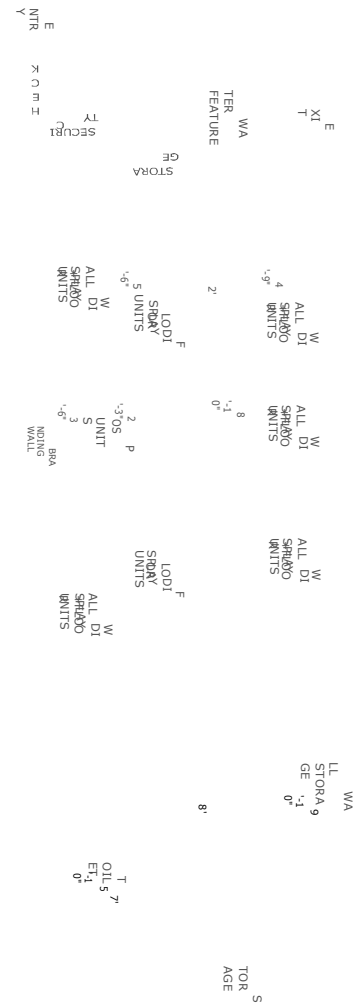
The physical address of our Cultivation facility will be:

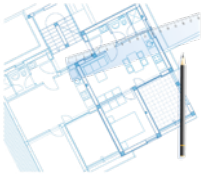
54 Walter st Hyde Park, MA 02136

A site plan showing the interior structure of the retail center is shown in the attachment. Our complete architectural plan will illustrate the entire layout of the facility and will have the following configurations:

- Areas where cannabis will be kept or handled have no external doors or windows and can be accessed only from within the facility.
- Walls separating the waiting room and retail area are 4" steel studded sheetrock walls with a solid-core wood door.
- The waiting room reception window will be equipped with bullet-proof glass.
- All main access point door hinges will be equipped with hinge-pin-locking screws to increase security.

This configuration yields optimal conditions for surveillance. These existing design elements will not only make unauthorized access extremely unlikely, but also act as a deterrent discouraging thefts.





## FLOOR PLAN

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A floor plan of the retail store detailing the location of the following:

- ➔ **All entrances and exits**
- ➔ **The location of any windows, skylights, and roof hatches**
- ➔ **The location of all cameras, and their field of view**
- ➔ **The location of all alarm inputs (door contacts, motion detectors, duress/hold up devices) and alarm sirens**
- ➔ **The location of the digital video recorder and alarm control panel**

## LIGHTING

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The main objectives of our security lighting system at the store are to illuminate dark areas and detect and recognize movement in the protected area. The best vision with outdoor lighting is obtained from downward directed and shielded security lighting that is constantly on, supplemented with instant-on lighting triggered by motion detectors.

LowKey Cultivation LLC will ensure that sufficient lighting

Requirements are met between dusk and dawn.

We will add external security lighting, including high flood spotlights to both facilities. Each facility and all walkways of each facility will be well illuminated to maximize visibility. Lighting will be operated automatically by a photo-sensor, ensuring that lighting will always be optimal for video capture.

## GUARDS

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Once the facility is operational, three local residents will join our team as security guards. Uniformed armed and unarmed security personnel will be on site monitoring the facility during hours of operation. All security personnel will be thoroughly screened, trained, and strictly supervised by our Security Department working in conjunction with a Security Consultant to ensure they are of the highest capability.

During operating hours, we will have at least one on-site

security guard at the entrance and one on-site security guard at the store.

Security personnel will perform and keep records of having performed routine regular inspections of all security systems, barriers, gates, doors, and locks, immediately reporting any malfunctioning or compromised security feature to the Security Agent. Any incidents qualifying as irregular or suspicious will be handled immediately.

# PHYSICAL SECURITY PLAN

We will secure the perimeter of our facilities to prevent unauthorized intrusion. With our store, we plan to use one or more of the following critical elements to secure the perimeter of our building: security fencing, security guards, and electronic surveillance (round-the-clock manned or alarmed camera surveillance and electronic intrusion detection).

The perimeter will be secured by video surveillance and adequate outside security lighting. In addition, during non-operational hours, all entry ways and exits and all windows will be externally covered by according metal fencing.

Motion detectors will monitor the inside of all exterior doors and windows. These are separate sensors from our video camera motion detectors.

## CUSTOMER ACCESS

The property has common parking spaces on its premises in the front of the building with additional parking in the rear of the building. These spaces will easily accommodate customer traffic. There also is an abundance of neighborhood parking in the surrounding areas in the event that parking on site is not possible.

## PROCEDURE

- A. Customers will enter the store through the facility's entrance via our main entrance on Washington Street.**
- B. Management personnel who will buzz customers into an area located between the waiting room and cannabis viewing holding area will authorize entrance into the areas where cannabis is kept.**
- C. Once in this holding area, store agents in the back can view anyone and control the second "buzzer door" allowing him or her into the cannabis area.**

The entry door to the cannabis products area will be operated on a "double buzzer" system, controlled by the person assigned to the control area. This person will be viewing the waiting room and allowing access into the rear only after proper screening and the agents in the back are ready. At this point, customers will be escorted to the area where the products can be viewed. No weapons will be allowed in the facility, and anyone entering the cannabis products area will have to walk through a metal detector. Signs that indicate this will also be posted. In addition, there will be a guard on site in the area of the cannabis products, roving the perimeter and the waiting area.

## INTERNAL ACCESS-POINT CONTROL

Movement within the facility will be tightly controlled. All main access doors, doors to the store will require keycards and electronic passcodes. In addition, customers will need to buzz in from the waiting room as described above. Only permitted employees will be allowed to enter into the store.

## LIMITED ACCESS TO SECURED AREAS AND VISITORS

Lowkey LLC has the limited access areas. Lowkey LLC ensures that the secured areas are accessible only to licensee, licensee representatives, and authorized personnel, service personnel or distributors.



## ELECTRONIC SECURITY SYSTEM

We will install a comprehensive electronic security system with video surveillance/recording capability, third-party monitoring, intrusion detection, and panic buttons.

### VIDEO SURVEILLANCE

We will employ state-of-the-art external and internal cameras, each with a minimum resolution capacity of 1280x720 pixels. All video footage will be stored for a minimum of 90 days. Recordings are subject to inspection. This is sufficient to allow facial identification of anyone in or nearing the facility.

External video surveillance will cover all areas of possible ingress and egress. Internal video surveillance will cover the following:

- 01// Waiting room
- 02// Reception office
- 03// The cultivation floor with a camera located at each point of sale location
  - a. The camera placement must allow for recording of the facial features of any person purchasing or selling cannabis goods
  - b. This covers all areas where cannabis is present or handled, including all point-of-sale locations, and all means of access to such areas.
- 04// Entrances and exits from both indoor and outdoor vantage points
- 05// Security Rooms
- 06// All limited access areas
- 07// Areas where cannabis goods are weighed, packed, stored, loaded, or unloaded for transportation, prepared, or moved within the premises.
- 08// Areas storing the surveillance system device with at least one camera recording the access points to the secured surveillance recording area
  - a. The physical media or storage device on which surveillance recordings are stored shall be secured in a manner to protect the recording from tampering or theft
- 9// Video surveillance will cover external and internal areas 24/7 at a minimum of 15 frames per second

A failure notification system will provide both audible and visible notifications if there is any failure in the electronic monitoring system.

## RISK MITIGATION

Harvest issues, Cash Management- Alpine IQ, Etc. - Least cash as possible

## THIRD-PARTY MONITORING

Lowkey Cultivation LLC anticipates contracting with vendor to help deter, detect, and document security events at each facility from a remote location. Vendor will monitor for fire and for security breach of doors or windows. Trained professionals from their monitoring centers will be able to access our security surveillance system at all times and will report and document any suspicious activity. Our internal security personnel will work with vendor to establish guidelines for what entails suspicious activity and to ensure regulatory compliance.

There will be triggers around the facility to alert our monitoring team of a possible intrusion or unauthorized access. Triggers can be:

- **Motion-sensor surveillance cameras**
- **Motion-sensor laser beams**
- **Unauthorized electronic access**
- **Security and fire alarms**

## INTRUSION AND MOTION DETECTION

Our alarm system will have motion detectors covering entryways and exits, hallways, the retail sales floor, storage rooms, and windows.

## BURGLARY ALARM SYSTEM

We shall install, maintain, and use a professionally monitored robbery and burglary alarm system which meets the following requirements:

- ➔ A test signal shall be transmitted to the central station every twenty-four (24) hours
- ➔ At a minimum, the system shall provide coverage of all facility entrances and exits, rooms with exterior windows, rooms with exterior walls or walls shared with other facility tenants, roof hatches, skylights, and storage room(s) that contain safe(s)
- ➔ The system shall include at least one (1) holdup alarm for staff use
- ➔ The system shall be inspected, and all devices tested annually by a qualified alarm vendor.

## PANIC BUTTONS AND INTERNAL COMMUNICATIONS

Panic buttons will be installed inside the facility.

## FIRE SECURITY

The Processing Facility will comply with all local fire code requirements. Fire Prevention is a vital aspect of processing safety. As part of LowKey Dispensary's commitment to the safety of our employees, we have developed a comprehensive Fire Plan to address how fires will be prevented and managed/contained if they do occur. Knowing that people are our most valuable resources, all employees will be trained and required to conduct themselves with consistent due diligence to prevent fires from occurring.

## TRACKING SOLUTION

Company intends to use special tracking solution, which will allow us to remain compliant while helping to identify key data points to streamline and optimize inventory management at each phase of the operation: transportation, lab testing and dispensing.

**Transport Manifests** – Creating, submitting, and storing compliant transportation manifests noting vehicle, driver, and cargo contained for regulatory review.

**Product Details** – Product details for the inventory items, printing key information directly on the labels including ingredients, potency results, plus a reactive expiration date that can lock a product if it's past expiration.

**Data Driven CRM** – Out-of-the-Box Customer Relationship Management (CRM) tools to reward loyal customers and referrals. Setup targeted email and text campaigns based on customer's favorite products, last visit date, purchase history, birthdays and more.

**Inventory Management** – Analyzing the sales data to optimize the inventory to the customers.



# ORGANIZATIONAL STRUCTURE

A Boston and beyond where underrepresented voices are elevated, quality cannabis drives equitable community benefits, local culture is embraced, and high-quality, craft cannabis is cultivated with care. #LevelUp

A Boston known far and wide for high-quality, exclusive craft cannabis produced by LowKey Cultivation's industry-leading team—made up of local community members—in their advanced grow facility.

LowKey Cultivation: Grown in Boston. Loved the World Over.



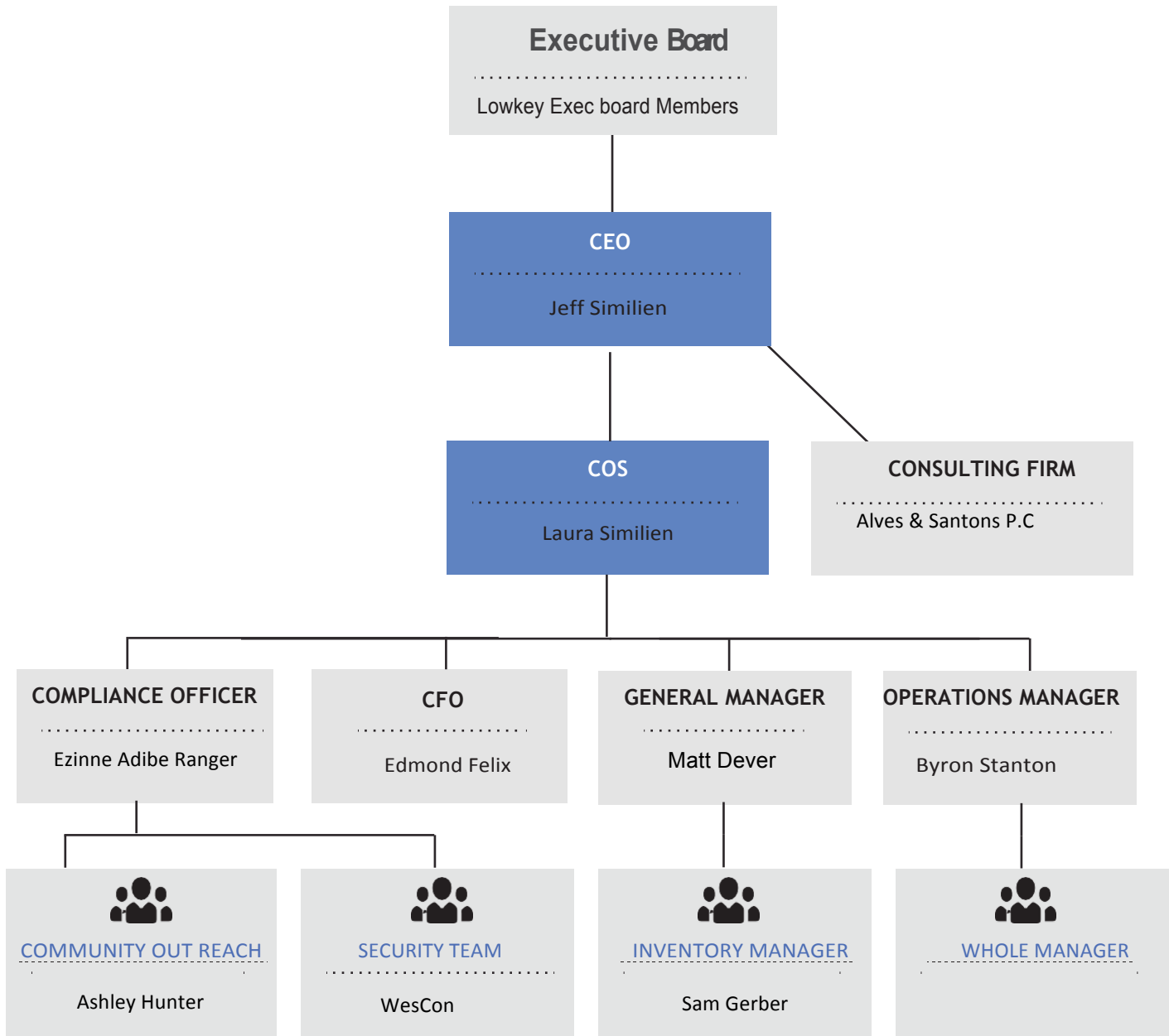
## 2023 Top-Ten Strain Lineup

Our Head cultivator, Barry Handy, is a Boston native and cannabis connoisseur. He's handpicked the variety of top-quality seeds that will create our custom lineup of craft flower for 2023.

We use Agrify—a leader in the industry who provides some of the most advanced grow technology and management available—to ensure our crop hits hard. Our cultivation practices are pure, thorough, and effective. Look at the flower and see for yourself.

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## LOWKEY CULTIVATION'S ORGANIZATIONAL STRUCTURE IS AS FOLLOWS:



# CHIEF EXECUTIVE OFFICER

## JEFF SIMILIEN

### Narrative Description

Jeff Similien is an experienced, savvy commercial and residential broker in the Greater Boston area and beyond. Jeff is the founder and CEO of Boston Trust Realty Group Commercial, LLC. BTRG Commercial is located in the heart of Mattapan Square, providing real estate services to members of the community. BTRG Commercial main focus is to educate their clients to make the best decisions when it comes to selling, purchasing, or leasing commercial real estate properties.

Jeff is currently working to obtain his license in the city of Boston to open a 100% black owned dispensary in Dorchester, and Mattapan. The Community he's currently deeply rooted in. If granted licensure, Jeff is using his platform to continue to create opportunities for job opportunities, mentorship in the cannabis establishment venture. In addition, Jeff intends to continue his work in the community by partnering and donating to community organizations to provide the youth access to build businesses, create opportunity, provide resources, and Education in real estate, stocks, taxes, investments, entrepreneurship, mentorship, and create leadership programs to have equity, equality in the world.



### JOB DESCRIPTION:

- Develop and implement operational policies and a strategic plan.
- Oversee day-to-day operations and business activities to ensure they produce the desired results and are consistent with the overall strategy and mission.
- Oversee the company's fiscal activity, including targets, budgeting, reporting, and auditing.
- Create an environment that promotes great performance and positive morale.
- Build alliances and partnerships with other organizations.
- Develop the company's culture and overall company vision.
- Assure strict adherence to all legal and regulatory aspects.
- Review financial and non-financial reports to devise solutions or improvements.
- Report to the board of directors on a regular basis to provide transparency.

## CHIEF OPERATING OFFICER

### **LAURA SIMILIEN**

Multi-passionate Woman, balancing my full-time career as a Sr. Research Administrator while building my Real Estate portfolio and working on my passion projects.

Works under the direction of the Principal Investigator performs management responsibilities in a research laboratory, including fiscal/budget management, supervision of staff activities, inventory management, ordering of supplies, helping prepare letters of recommendation, preparation of reimbursements for the Principal Investigator and other laboratory staff, and aiding in on-boarding new students and post-docs.

Supervises operation of the laboratory, including overseeing the use of laboratory funds, supply inventory and staff activities.

In conjunction with Investigator, manages lab personnel, including hiring, firing, performance evaluation, disciplinary action, orientation and training. Ensures proper on-boarding procedures are followed for students, staff, fellows and faculty.

Responsible for financial management of research lab. Develops budgets, analyzes trends, prepares

reimbursements, produces reports. Additionally, participates in coordinating the administrative aspects of the grant proposals.

Responsible for the coordination of all regulatory and compliance activities for the lab.

All other duties as assigned.

## CHIEF FINANCIAL OFFICER

### **EDMOND FELIX, JR.**

Edmond has a Bachelor's in Accounting from The University of Massachusetts Boston and Northeastern University. Edmond launched his career by working, as an accountant for small firms to Fortune 500 companies and meeting the accounting needs of corporations and individuals for the past fifteen years. Edmond specializes in preparing assets, liability and capital account management, and analysis through careful risk, benefit and options. He is passionate about educating his community and for the past 15 years he has been using his knowledge to advise others on how to better invest and manage their funds.

## SECURITY FIRM

### **WesCon**

WesCon Protection is licensed, insured and bonded, and offers guards who are certified to perform security procedures in the Commonwealth of Massachusetts. WesCon officers undergo extensive background checks, training in compliance with Commonwealth of Massachusetts regulations, an additionally, instruction that prepares them to provide CPR in times of emergencies.



## The Viridity Group

The Viridity Group offers staffing, training, and planning, they provide services for Dispensary business which are in their infancy to highly established ventures. They can help us optimize, grow, and succeed while navigating the complexities of cannabis regulations.

## HUMAN RESOURCES



# HEAD OF CANNABIS SALES



## JOB DESCRIPTION:

- Oversee day-to-day operations of the dispensary. Manage all tasks related to the dispensary, sales and marketing, public relations, inventory, and accounting.
- Responsible for the sales and growth of the dispensary
- Train staff on customer service, sales and product knowledge to ensure guests receive the best service possible.
- Assist the executive team with the implementation of operational rules, regulations, policies, and procedures; ensuring best practices are consistently adhered to by staff. Ensure all manuals are up to date.
- Ensure all staff is on time, in professional attire and well groomed
- Complete checkouts for budtenders and ensure all cash handling procedures are being followed
- Ensure all opening duties are completed before opening and closing duties are completed and the venue is completely secured before departing for the night
- Work with distribution team to communicate inventory and needs
- Maintain current knowledge of all state and local laws and regulations for cannabis sales, ensuring dispensary's compliance with local and state regulations
- Supervise Dispensary staff and Security Team.
- Maintain accurate records of all dispensary activities including daily cash reconciliations, customer records, sales, deliveries in accordance with the State of Massachusetts and provides a monthly report to the Executive Board.
- Responsible for ordering all Dispensary inventory and supplies.
- Maintain inventory control system and performs daily counts of all cannabis products in the facility
- Ensure proper ambiance and cleanliness within venue at all times
- Conduct quarterly staff reviews as well as employee annual reviews
- Set sales goals and incentives for all staff
- Work with management team to create and implement staff incentive programs to increase level of service, promote upselling, and enhance staff morale
- Participate in local area business organizations and networking groups
- Make recommendations and be proactive on ways to make the store better
- Monitor display every day
- Provide timely and highly accurate recording of expense classification for city/county/state taxes.
- This position is ultimately responsible for and enforcing employees' strict adherence to laws and regulations concerning medicinal/recreational cannabis.

# SECURITY TEAM



## JOB DESCRIPTION:

### **Establish and monitor key activities, employees and security SOP's**

- Develop, enhance and monitor program management methodologies
- Work with teams to ensure timely reporting of status
  - o Create and maintain a log of risks and issues requiring escalation
  - o Proactively identify resources necessary to meet established timelines
  - o Integrate individual initiative timelines into overall master program schedule
  - o Prepare regular reports on program status and coordinate review schedules
  - o Manage and train entire security staff

### **Develop briefings and other oral or written materials for the managing leads. Convey the status and outcomes to key management.**

- Coordinate with senior management on program strategy
- Maintain required compliance protocol
- Conduct analyses on a broad range of potential issues including security risk
- Collect, organize and document key operational information
- Be highly motivated and possess vision and enthusiasm
- Be flexible and comfortable with ambiguity and shifting priorities
- Be comfortable acting as an individual contributor and leading through others
- Understand how to deliver on short time frames and be committed to meeting deadlines
- Communicate in an open and honest way that quickly builds trust and respect
- Be comfortable functioning as a member of a dispersed team
- Be comfortable managing a small team of security personnel.
- Be knowledgeable in local regulations pertaining to security protocol

## COMPLIANCE OFFICER



### JOB DESCRIPTION:

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The Director of Compliance will keep the management team up to date on legal and regulatory matters impacting operations, assist in the development of company policies and standard operating procedures, monitor operations to identify and correct instances of non-compliance, and function as a quasi-independent and objective body that reviews and evaluates compliance issues/concerns within the organization.

You will also work with a variety of directors to develop and implement processes, policies, and systems related to compliance and ensure their effectiveness. This individual will also be involved with; reporting, registration, filing, and other similar mandatory tasks are completed in a timely fashion and coordinate with Lowell's management to stay ahead of any future changes in regulations.

Our ideal candidate is detail-oriented, self-motivated, and has in-depth knowledge of Massachusetts cannabis laws and regulations

### QUALIFICATIONS / REQUIREMENTS

- Experience: Minimum of eight (8) years' experience of working in another highly regulated industry, ideally in a compliance-related position.
- Have strong attention to detail and a natural aptitude for organization and systematization.
- Strong working experience with packaging/labeling codes and excellent analytical skills with an attention to detail.
- Heavy manifest tracking and trade programs such as Metric.
- Working experience being a feet on the ground, operationally sound as well as can forecast regulation change or industry shifts.
- Have an in-depth understanding of all applicable existing and recent cannabis laws and regulations in Massachusetts.
- Abilities: Demonstrated ability to present and communicate effectively with executive management. Proven track record of collaborative problem solving with senior management and business leaders to achieve business goals.

### PREFERRED SKILLS

- Have professional experience working in or with licensed cannabis businesses in a mature legal cannabis state such as Colorado, Washington, or Oregon.
- Have overseen Packaging compliance, as our packaging is so paramount to our brand.



# ASSISTANT MANAGER



## JOB DESCRIPTION:

The Assistant Manager (AM) assists in all aspects of the daily operations. The AM will have primary responsibility for leading and developing a team to implement and continuously improve the customer experience and operational initiatives. The AM must be knowledgeable with regulatory requirements and state/local law and ensure processes are followed in line with compliance.

## DUTIES AND RESPONSIBILITIES OR (ESSENTIAL FUNCTIONS)

- Perform store opening and closing responsibilities, including daily cash reconciliation and reporting.
- Manage and train bud tenders
- Manage Bud tender scheduling
- Perform required inventory management and processes including counts and reconciliations, ordering, fulfillment, receiving, reorders, availability, cannabis waste disposal, reporting by acceptable accounting principles and remedy discrepancy issues.
- Establish and implement operational and customer focused policies, standards and procedures for retail staff.
- Under the direction of the SM, assist in hiring, onboarding /off boarding, coaching, training, developing, scheduling and managing dispensary employees, including conducting regular performance reviews and counseling sessions.
- Develop high customer experience standards and engagement through sales training and product knowledge.
- Implement an outreach/hospitality program through networking, customer and market data analysis and execution of company promotions and programs.
- Follow all processes to ensure accurate and safety protocols are maintained as part of the quality assurance program.
- Fill in for Store Manager as needed.

# TRIMMERS



## JOB DESCRIPTION:

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Positive and hardworking team player for a part-time position. Our employees are responsible for providing the highest quality of service to customers at all times, as well as keeping our dispensary clean and organized. They must be friendly and professional during all interactions with patients and other guests, as well as perform all tasks as directed by management.

## QUALIFICATIONS:

- Must be 21+.
- Ability to work under pressure.
- 1 year of retail/customer service experience required.
- Experience and knowledge in the cannabis industry.
- Good punctuality.
- Reliable transportation.
- Strong written and oral communication skills.
- Available on some weekend days. (Friday night, Saturday, and Sunday)
- Bilingual is a plus!!!

## DUTIES OF A BUDTENDER INCLUDE BUT ARE NOT LIMITED TO:

- Assisting patients in choosing products that best suit their unique needs.
- Accurately describing methods of consumption, ratios, milligrams of THC/CBD and dosages to patients.
- Cash Handling POS experience.
- Restocking and cleaning store.
- Keeping up to date on new developments and laws in the cannabis industry.
- Have an understanding cannabinoids and their medical uses.

# RECEPTIONIST

**Position Summary:** Provides general office support with a variety of clerical activities and related tasks. The receptionist will be responsible for answering incoming calls, directing calls to appropriate associates, mail distribution, flow of correspondence, greeting customers, have a thorough understanding of dispensary offerings, cannabis knowledge and regulatory compliance, as well as additional administrative duties.



## ESSENTIAL DUTIES AND RESPONSIBILITIES:

- Greet and check customers in using industry POS system while adhering strictly to compliance rules and regulations around ID verification and documents required for check-in
- Demonstrates consistent exceptional customer service skills and professional phone etiquette
- Answer phone calls and customer inquiries with extreme professionalism
- Escort customers to the appropriate room in an orderly fashion
- Manage and record the inflow and outflow of people entering and exiting retail location
- Maintains security by following procedures; maintaining visitor/delivery logs; issuing visitor badges, manage authorization as needed for visitors/contractors
- Monitor security cameras
- Generates reports as necessary including, but limited to: weekly updates of customer volume, new customers, repeat customers, weekly sales volume, and percent sales volume of new vs. repeat customers, etc.
- Receives, sorts and forwards incoming mail.
- Maintains and routes publications
- Coordinates the pick-up and delivery of express mail services (FedEx, UPS, etc.)
- Assists with other related clerical duties such as photocopying, faxing, filing and collating
- Other office support and customer service related activities as assigned by management
- Ensures menus are updated and printed daily
- Maintain a clean and organized work environment and upkeep of lobby and reception area.
- Comply with all HR policies, including confidentiality and non-disclosure
- Regular attendance is expected and is considered an essential function; as it is necessary for the efficient operation of the business.
- Assist in the ordering, scheduling and planning of events and lunches
- Must exhibit competency in basic organizational, tracking, and communication skills
- Must be able to work well independently, as well as with others
- Maintains a positive attitude and fosters a positive work environment
- Other duties as assigned

## REQUIRED QUALIFICATIONS:

- The incumbent must possess or have the ability to obtain a State approved license and background check and be over the age of 21.
- High School Education or GED; Associates Degree preferred.
- 2 years of administrative experience; 4 years related experience preferred.
- General product knowledge.
- Excellent customer service and verbal communication skills.
- Basic computer and mathematical skills
- Competent in Microsoft Word, Excel, Outlook, PowerPoint
- Must be and remain compliant with any and all legal or company regulations for working in the industry
- While performing the duties of this job, must be able to regularly reach, grasp, bend, stand, walk, sit, talk, and listen.
- May occasionally need to lift and/or move up to 25 pounds as it relates to the office environment.
- Must be able to sit and/or stand for extended periods of time while maintaining focus

# FINANCIAL PLAN



# DIRECT AND OPERATING EXPENSE BREAKDOWN

## STARTUP EXPENSE

Startup Expenses	
<b>Buildings/Real Estate</b>	
Purchase	\$900,000.00
Construction	\$500,000.00
Remodeling	\$0.00
Other	\$0.00
<b>Total Buildings/Real Estate</b>	<b>\$1,400,000.00</b>
<b>Leasehold Improvements</b>	
Item 1	\$500,000.00
Item 2	\$0.00
Item 3	\$0.00
Item 4	\$0.00
<b>Total Leasehold Improvements</b>	<b>\$500,000.00</b>
<b>Capital Equipment List</b>	
Furniture	\$35,000.00
Equipment	\$25,000.00
Fixtures	\$50,000.00
Machinery	\$20,000.00
Other	\$25,000.00
<b>Total Capital Equipment</b>	<b>\$145,000.00</b>
<b>Location and Admin Expenses</b>	
Rental	\$7,000.00
Utility deposits	\$10,000.00
Legal and accounting fees	\$20,000.00
Prepaid insurance	\$10,500.00
Pre-opening salaries	\$40,000.00
Other	\$10,000.00
<b>Total Location and Admin Expenses</b>	<b>\$97,500.00</b>
<b>Opening Inventory</b>	
Category 1	\$185,000.00
Category 2	\$0.00
Category 3	\$0.00
Category 4	\$0.00
Category 5	\$0.00
<b>Total Inventory</b>	<b>\$185,000.00</b>
<b>Advertising and Promotional Expenses</b>	
Advertising	\$30,000.00
Signage	\$7,500.00
Printing	\$3,500.00
Travel/entertainment	\$2,000.00
Other/additional categories	\$5,000.00
<b>Total Advertising/Promotional Expenses</b>	<b>\$48,000.00</b>
<b>Other Expenses</b>	
Other expense 1	\$9,500.00
Other expense 2	\$0.00
<b>Total Other Expenses</b>	<b>\$9,500.00</b>
<b>Reserve for Contingencies</b>	
Amount	\$10,000.00
<b>Working Capital</b>	
Amount	



## SOURCE OF CAPITAL

### Summary Statement

Sources of Capital	
Owners' and other investments	\$125,000.00
Bank loans	\$0.00
Private investors	\$2,000,000.00
<b>Total Source of Funds</b>	<b>\$2,125,000.00</b>

Startup Expenses	
Buildings/real estate	\$1,400,000.00
Leasehold improvements	\$500,000.00
Capital equipment	\$145,000.00
Location/administration expenses	\$97,500.00
Opening inventory	\$185,000.00
Advertising/promotional expenses	\$48,000.00
Other expenses	\$9,500.00
Contingency fund	\$10,000.00
Working capital	

## VALUATION

Valuation Unit Investment Offering	LowKey Cultivation	
	2022	
Valuation, Investment, Units		
Investment amount	10,000,000.00	
Equity Units	20%	
Valuation	50,000,000.00	
Share Ownership		
Founder's Units	40,000,000.00	
Investors Units Issued	10,000,000.00	
Price per Unit	5.00	

# PROFIT & LOSS FORECAST

Business's revenue is projected to grow significantly for the first two years' timeframe. Year one projections are in the table below:

## LowKey Cultivation


### PROFIT & LOSS FORECAST

#### REVENUE

Sales Revenue  
COGS

Total Revenue  
% of Revenue

#### EXPENSES

Salaries- Regular Pay  
Salary related expense  
Benefits  
Rent Expense  
Information Technology Equip  
Travel & entertainment expense  
Office Expense  
Marketing/Avertising  
Professional Fees  
Fees and Membership  
Other Fees  
Donation to the City of Boston  
Total expense  
% of Revenue

Earning Before Dep. and Income Taxes (EBITDA)

Depreciation/Amortization

Sales Tax

Excise Tax

Local Tax

Net Income

% Profit Margin

## FORECAST

LowKey Cultivation					
Year 1	Year 2	Year 3	Year 4	Year 5	
41,208,000	37,087,200	34,966,800	33,936,600	33,936,600	
10,734,090	10,394,090	10,194,090	9,994,090	9,994,090	
\$30,473,910	\$26,693,110	\$24,772,710	\$23,942,510	\$23,942,510	
74%	72%	71%	71%	71%	
3,131,200	3,287,760	3,353,515	3,420,586	3,420,586	
277,787	287,514	292,544	297,675	297,675	
58,800	58,800	58,800	58,800	58,800	
276,000	276,000	276,000	276,000	276,000	
59,400	39,400	39,400	39,400	39,400	
12,250	12,250	12,250	12,250	12,250	
9,250	9,250	9,250	9,250	9,250	
61,500	51,500	41,500	41,500	41,500	
198,000	198,000	198,000	198,000	198,000	
6,000	6,000	6,000	6,000	6,000	
1,800	1,800	1,800	1,800	1,800	
\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	
\$4,141,987	\$4,278,274	\$4,339,059	\$4,411,260	\$4,411,260	
13.6%	16.0%	17.5%	18.4%	18.4%	
26,331,923	22,414,836	20,433,651	19,531,250	19,531,250	
100,000	100,000	100,000	100,000	100,000	
1,904,619	1,668,319	1,548,294	1,496,407	1,496,407	
3,275,945	2,869,509	2,663,066	2,573,820	2,573,820	
914,217	800,793	743,181	718,275	718,275	
\$ 20,137,141.20	\$ 16,976,214.36	\$ 15,379,108.89	\$ 14,642,747.70	\$ 14,642,747.70	
49%	46%	44%	43%	43%	



## **LOWKEY DISPENSARY**

**Jeff Similien  
Founder & CEO  
(617) 894-2266**

**[jeff@lowkeydispensary.com](mailto:jeff@lowkeydispensary.com)**



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

Lowkey Cultivation is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”) or any other regulatory agency. This policy is to provide clear and concise instructions for Lowkey Cultivation employees regarding the Maintenance of Financial Records that are in compliance with the Regulations.

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

### **Policy:**

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

All Lowkey Cultivation financial/business records will be available for inspection to the Commission upon request. Lowkey Cultivation will maintain all business records in Manual and electronic (computerized) form. These records include, but are not limited to; assets and liabilities, monetary transactions, books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers, sales records including the quantity, form, and cost of marijuana products; and salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

In relation to the maintenance of financial records, Lowkey Cultivation will incorporate the following into our business operations;

1. Lowkey Cultivation will engage the services of a professional payroll and human resources company to assist in Human resources management and payroll services for our employees.
2. Lowkey Cultivation has and will maintain a banking relationship with Century Bank to

provide banking services for our company.

3. Lowkey Cultivation will use up to date financial software programs for all financial transactions.
4. Lowkey Cultivation does not plan to make cash transactions with other Marijuana Establishments. All transactions will be done through traditional banking transactions including checks, wire transfers or credit cards.
5. On an annual basis, Lowkey Cultivation will engage the services of an independent certified public accountant who is preferably experienced in the legal marijuana industry, to conduct a financial audit of Lowkey Cultivation finances(books).
6. Lowkey Cultivation will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.
7. At the end of each business day a reconciliation audit will be done on each POS station by the Facility Manager or designee.
8. Comprehensive financial audits will be done at the end of every day by the Comptroller or designee. At the discretion of the comptroller the frequency of these audits may be changed to weekly and then monthly.
9. At a minimum, a comprehensive audit by the comptroller or designee of all sales transactions will be completed every month.
10. For the first year of operation the comptroller will conduct a comprehensive audit of all of the facility's financial records every 3 months and report their findings to the CEO and COO.

#### **Access to the Commission:**

Lowkey Cultivation electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

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

Lowkey Cultivation books, records, papers and other data will be made available upon request by the DOR.

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



ledger, will also be maintained and made available upon request.

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

Additionally, Lowkey Cultivation will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

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

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

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected. Along with the data in the POS system, Lowkey Cultivation will maintain the following records:
  - a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable.
  - b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions.
  - c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal.
  - d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information.
  - e. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.
2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:
  - a. individual item(s) sold,
  - b. selling price,
  - c. tax due,

- d. invoice number,
  - e. date of sale,
  - f. method of payment, and
  - g. POS terminal number and POS transaction number.
3. Lowkey Cultivation will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
- a. Internal sequential transaction numbers;
  - b. Records of all POS terminal activity; and
  - c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
  - d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
  - e. Any and all activity related to other operating modes available in the system, such as a training mode; and
  - f. Any and all changes in the setup of the system.
4. Lowkey Cultivation will comply with the provisions of 935 CMR 500.140(6): Recording Sales.
- a. Lowkey Cultivation will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.
  - b. Lowkey Cultivation may utilize a sales recording module approved by the DOR.
  - c. Lowkey Cultivation will not utilize software or other methods to manipulate or alter sales data.
  - d. Lowkey Cultivation will conduct a monthly analysis of our equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Lowkey Cultivation will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Lowkey Cultivation determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
    - i. We will immediately disclose the information to the Commission;
    - ii. We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
    - iii. We will take such other action directed by the Commission to comply with 935 CMR 500.105.
  - e. Lowkey Cultivation will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16- 1 regarding recordkeeping requirements.
  - f. Lowkey Cultivation will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

- g. Lowkey Cultivation will allow the Commission and the DOR to audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.



## Operating Policies and Procedures

### Lowkey Cultivation

MCN283125

#### 21+ Policy - Restricting Access to Age 21 and Older

Lowkey Cultivation Retail Marijuana Establishment operations will be compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB”),(CCC) or any other regulatory agency. The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that access to our facility is restricted to only persons who are 21 years of age or older.

#### Definitions:

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

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

**Proof of Identification** means a government issued photograph that contains the name, date of birth, physical description and signature of the individual and is currently valid (in other words, not expired). Lowkey Cultivation will only accept the following forms of proof of identification that include all of the above criteria;

1. Massachusetts driver’s license
2. Massachusetts Issued ID card
3. Out-of-state driver’s license or ID card
4. Government issued Passport
5. U.S. Military I.D.

**Visitor** means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55

and 935 CMR 500.000, provided, however, that **no such individual shall be younger than 21 years old.**

### **Responsibilities:**

Lowkey Cultivation ] Management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Lowkey are 21 years of age or older.

### **Access to the Facility:**

(For the purposes of this Policy, the term facility also refers to any vehicle owned, leased, rented or otherwise used by Lowkey for the transportation of Marijuana.)

Lowkey Cultivation 's facility is located at 54 Walter Street, Boston MA 02136, which only allows the following individuals access to our facility:

1. Lowkey Cultivation Agents (including board members, directors, employees, executives, managers, or volunteers) - while at the facility or transporting marijuana for the facility, all Lowkey Cultivation Agents must carry their valid Agent Registration Card issued by the Commission.
  - a. All Lowkey Cultivation Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
3. Visitors - Outside Marijuana Establishments, Vendors and Contractors
  - a. Prior to being allowed access to the facility or any Limited Access Area, the visitor must produce a government issued identification card to a member of the management team and have their age verified to be 21 years of age or older.
    - i. If there is any question as to the visitor's age, or if the visitor cannot produce a government issued identification card, they will not be granted access.
  - b. After the age of the visitor is verified, they will be given a Visitor Identification Badge.
  - c. Visitors will be escorted at all times by a marijuana establishment agent authorized to enter the limited access area.
  - d. Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exit.
    - i. The visitor log will be available for inspection by the Commission at all times
4. Member of the Commission, Emergency Responders and Law Enforcement.
  - a. The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:
    - i. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR



500.000;

- ii. Representatives of other state agencies of the Commonwealth; and
  - iii. Emergency responders in the course of responding to an emergency.
  - iv. Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
- b. Individuals described above in this policy will be granted immediate access to the facility.

## **I. Training**

Lowkey Cultivation will train all Agents on the verification and identification of individuals. This training will be done prior to Agents performing age verification duties. Management will supply Age Verification Smart ID Scanners and hardcover books to assist Agents in age verification.

All Lowkey Cultivation Agents will enroll and complete the Responsible Vendor Training Program when it is available. This curriculum will include:

- a. Diversion prevention and prevention of sales to minors;
- b. Acceptable forms of identification, including:
  - i. How to check identification;
  - ii. Spotting false identification;
  - iii. Medical registration cards issued by the DPH;
  - iv. Provisions for confiscating fraudulent identifications; and
  - v. Common mistakes made in verification



# **Operating Policies and Procedures Qualification and Intended Trainings for Agents Lowkey Cultivation LLC**

## **Agent Training**

All Lowkey Cultivation employees will receive extensive training prior to commencing work.

- Training and education will be ongoing and all-encompassing.
  - o covering regulatory compliance
  - o seed-to-sale tracking
  - o point-of-sale training.
  - o dispensing
  - o security protocols and diversion prevention
  - o health and safety protocols, sanitation
  - o Commission rules & regulations,
  - o SOPs regarding products, identifying underage users, code of conduct, emergency protocols, incident reporting.

Lowkey Cultivation will have all new employees complete the Responsible Vendor Training Program within 90 days of being hired. Responsible Vendor Program documentation will be retained for four years. 935 CMR 500.105(2)

Lowkey Cultivation current owners, managers, and employees shall complete the Responsible Vendor Program.

Training will include an extensive hands-on approach and the use of Standard Operating Procedures (SOPs) and various other materials and methods as deemed appropriate.

Proper training is the cornerstone of maintaining compliance in this rigorously regulated industry. In order to achieve core-competency among all employees and agents of the company, we have developed a mandatory training regimen.

Upon hire, all employees and agents, including the principals and/or owners of the company, will be required to undergo written and lecture based training during the first week of employment. Before Cultivation operations commence, all employees and agents must

complete the training and show core-competency by passing a written exam for each required subject area. Some subject areas are required for all employees and agents, whereas others are job specific. Each job description will have a list of the required training for that position.

If core-competency cannot be achieved, the employee or agent will not be able to progress to the 'hands-on' training curriculum and participate in production activities.

Individual job descriptions have been developed for each position in the organization. The purpose is to ensure that all personnel are clear about their role and responsibilities, and understand how their position contributes to the safe, efficient operation of Lowkey.

Management positions include the following:

- Board of Managers - Oversee the entire Cultivation operation and ensure that Lowkey Cultivation successfully delivers on its mission and business objectives.
- Chief Executive Officer - Organize and supervise day-to-day operations.
- Chief Operations Officer - Oversee the provision of all operations related to cultivation and maintenance of the facility; Ensure regulatory compliance
- Inventory Manager - Supervise inventory
- Cultivation Manager - Responsible for the Cultivation, extraction, and manufacturing facility. Responsible for strain selection, grow plans and management of Cultivation, trimming, drying, curing and processing teams.

**Diversion Prevention** - Any physical moving of marijuana from its assigned and tracked point of origin or current assigned placement in the facility, or attempt thereof is considered diversion or attempted diversion. Further, any unapproved changes to the digital inventory tracking system may constitute attempted diversion and will be investigated.

The training will consist of a review of the sections of the Act and Regulations pertinent to security, inventory, marijuana storage, diversion detection as well as prevention.

Employees and agents will be informed that diversion of marijuana may result in criminal charges and termination of employment for those individuals who participate, aid in or abet diversion.

Employees and agents will be asked to sign, as a condition of employment, an attestation statement that they are aware of the definition and illegality of diversion.

***Our detection training will be achieved by educating employees and agents about the following two methods that will be employed:***

**Continuous maintenance of our inventory tracking system:**

Most losses of marijuana will be red flagged by the inventory tracking system. Regular auditing of inventory of marijuana at the facility will help ensure diversion is either deterred and or discovered. Given that some minor deviations in weight are expected due to

temperature changes and degradation of flower, we will be observant for patterns indicative of diversion in those deviant weight changes.

### **Recognition of signs of diversion**

- There are many possible signs of diversion including firsthand witnessing of a theft however there are possibly subtler indicators such as odd employee behavior or visible changes in plant or batch size.
- Prevention training consists of behaviors and actions that make diversion difficult. Creating a culture of total compliance is only a part of what must be done to prevent diversion. In addition, organization, proper tracking protocols
- steady-fast compliance with the Act and managerial intolerance towards unacceptable behaviors and actions help create a stronger deterrent.
- We will also strive to reward employees that achieve higher levels of accuracy in product handling.

### **Federal and State Marijuana Laws**

- All employees and agents will receive a job offer or contract agreement for employment. As part of that offer/agreement we will provide an attestation form which states: “By accepting this position you understand that your employment may be in violation of the Federal Controlled Substances Act, as marijuana manufacturing and possession remain illegal under Federal Law.”
- Employees will be provided a copy of the “Cole Memorandum” issued by the Department of Justice.
- Our company attorney will be contracted to provide a marijuana laws training session for all new employees and agents to ensure they have the necessary and requisite understanding of state and federal laws as they pertain to marijuana.
- All employees and agents will be required to read the CCC regulations. After completion of this reading, they will be required to sign an attestation that they have read and understand their obligations under the Regulations and the Act.

### **Standard Operating Procedures Training**

- The company will employ job descriptions for each available position. Each job description will include a list of required standard operating procedures that must be administered to establish core competency for that position.
- The new hire will receive copies of the required SOPs and will be required to read them prior to taking a written exam. The new hire will not be able to proceed to the hands-on training curriculum until they have developed core-competency in the required procedures.
- If an employee has not developed core-competency for both the hands-on and written curriculums by the end of their probationary period they may be terminated.

## **Covid-19 Agent Reporting Writing**

Lowkey Cultivation will have and follow written operating procedures promoting workplace safety, which includes protocols addressing COVID-19 (Coronavirus). Licensee COVID-19 Standard Operating Procedures should include reports to the Commission of any instance of an employee work-related illness resulting in a confirmed COVID-19 case immediately after obtaining actual knowledge of a confirmed case, but in no event later than twenty-four (24) hours. Licensees are to report this information using the Agent COVID 19 Reporting Form on the Commission website.





## **Operating Policies and Procedures**

### **Lowkey Cultivation**

#### **Record-Keeping Procedures**

Lowkey Cultivation will assure record-keeping procedures meet or exceed all Cannabis Control Commission regulations per 935 CMR 500: Adult use of Marijuana. All Lowkey Cultivation records will be available for inspection by the Commission, upon request. In the event Lowkey Cultivation closes, all records will be kept for at least two years at the expense of Lowkey Cultivation. Records will be maintained in a form and location acceptable to the Commission.

At a minimum, Record Retention policies and procedures will cover the following:

1. Personal Records
2. Financial Records
3. Inventory Records
4. Operating Procedures
5. Business Records
6. Waste Disposal Records

#### **1. Personal Records-**

Lowkey Cultivation personnel records include job descriptions for each employee and volunteer position, well an organizational chart consistent with the job descriptions, and personnel record for each Marijuana Establishment agent. Personal records will be maintained for at least 12 months after termination of the individual's affiliation with Lowkey Cultivation and will include, at a minimum, the following:

- all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- documentation of verification of references;
- the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- documentation of periodic performance evaluations;
- a record of any disciplinary action taken;
- notice of completed responsible vendor and eight-hour related duty training. ●

All background check reports obtained in accordance with 935 CMR 500.030.

Additionally, Lowkey Cultivation has developed a staffing plan that demonstrates accessible business hours and safe Cultivation conditions;

## **2. Financial Records**

Lowkey Cultivation financial records will be maintained in accordance with generally accepted accounting principles. Financial records, which shall include manual or computerized.

Financial records include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products; ● Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Lowkey Cultivation

## **3. Inventory Records**

Lowkey Cultivation will not commence adult-use sales until approval from the Commission, subject to the limitations in 935 CMR 500.140(10). At the point of sale, we will also designate whether Marijuana products are intended for sale for adult use or manufacturing use through tracking methodology approved by the Commission. Lowkey Cultivation will follow laws governing taxation in the Commonwealth, including, but not limited to, the laws regarding taxation, filing audit and seizure.

Lowkey Cultivation will continue to utilize real-time seed-to-sale inventory tracking methodology. Lowkey Cultivation will utilize Seed-to-Sale tracking to tag and track all marijuana seeds, clones, plants, and Marijuana products intended for sale for adult use. Such seed-to-sale software will be approved by the Commission. Real-time inventory will be maintained as specified by the Commission, including, at a minimum inventory of:

- marijuana seeds
- marijuana plants in any phase of development such as propagation, vegetation, and flowering
- marijuana ready for dispensing
- all marijuana products
- all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal

Lowkey Cultivation will establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana in the process of Cultivation, and stored marijuana. Lowkey Cultivation will conduct a monthly inventory of marijuana in the process of Cultivation and finished, stored marijuana. Lowkey Cultivation will also conduct annual inventory at least once every year after the date of the previous comprehensive inventory. Oral devices will not be used for inventory control.

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

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that is not capable of being tested by an Independent Testing Laboratories, except if allowed by 935 CMR 500.000.

#### **4. Operating Procedures**

Lowkey Cultivation will have and follow a set of detailed written operating procedures in full compliance with 935 CMR 500.000. Each Lowkey Cultivation location will have its own set of applicable procedures on site.

At a minimum, procedures will include:

- Security measures in compliance 935 CMR 500.100
- Employee security policies, including personal safety and crime prevention techniques
- Description of hours of operation and after-hours contact information provided to the Commission and appropriate law enforcement officials upon request
- storage procedures in compliance with 935 CMR 500.105(11)
- Description of various strains of marijuana Lowkey Cultivation will cultivate, process or sell, and the forms in which we will sell such marijuana
- Procedures for accurate record keeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9)
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160
- Staffing Plan and staffing records in compliance with 935 CMR 500.105(9)
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies.
- Alcohol, smoke, and drug-free workplace policies
- Plan describing how confidential information is maintained and handled
- Policy for the immediate dismissal of an Lowkey LLC agent who has:
  - diverted marijuana, which will be reported to appropriate law enforcement officials and to the Commission
  - engaged in unsafe practices with regard to operations of Lowkey LLC facilities, which will be reported to the Commission
  - been convicted or entered a guilty plea, pleas 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.

- List of all board members and executives of Lowkey Cultivation and members, if any, of Lowkey Cultivation will be made available upon request by any individual.
- Cash Handling policies and procedures including storage, collection frequency, and transport to financial institutions.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old
- Policies and procedures for energy efficiency and conservation

## **5. Business Records**

Business records may be computerized or manual. Records will include: assets and liabilities; monetary transactions; books of accounts which include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; sales records including the quantity, form, and cost of marijuana products; and salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Lowkey Cultivation.

## **6. Waste Disposal Records**

Lowkey Cultivation will dispose of all waste as required under 935 CMR 500.105(12). Such records will be maintained for three years.



## **Operating Policies and Procedures**

### **Quality Control and Testing Procedures**

#### **Lowkey Cultivation**

#### **Quality Control**

No marijuana or marijuana product will be sold or marketed for adult use that is not tested by Independent Testing Laboratories and deemed to comply with the standards required under 935 CMR 500.160, except as allowed under 935 CMR 500.000.

Lowkey Cultivation will have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established by the Commission. Any such policy will include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the product. The notification from Lowkey Cultivation will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. Lowkey Cultivation will maintain the results of all testing for no less than one year. Lowkey Cultivation will process cannabis in a safe and sanitary manner. We will process the leaves and flowers of the female cannabis plant only, which will be:

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

We will comply with the following sanitary requirements:

- Any agent whose job includes contact with cannabis or nonedible cannabis products, including Cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements
- Any agent working in direct contact with preparation of cannabis or nonedible cannabis products will conform to sanitary practices while on duty, including:
  - Maintaining adequate personal cleanliness; and
  - 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.

- Hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature.
- Hand-washing facilities will be located in 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
- There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations
- Litter and waste will be carefully removed, 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)
- Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair
- Buildings, fixtures, and other physical facilities will be maintained in a sanitary condition • 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 cannabis products
- The water supply will be sufficient for necessary operations. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet the Cannabis Establishment's needs
- Plumbing will be of adequate size and design, and adequately installed and maintained to carry enough water to required locations throughout the Cannabis Establishment.
- Plumbing will properly convey sewage and liquid disposable waste from the Cannabis Establishment. There will be no cross-connections between the potable and wastewater line
- We will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair
- Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers

Testing -No cannabis product, including cannabis, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.



## **Covid-19 Agent Reporting Writing**

Lowkey Cultivation will have and follow written operating procedures promoting workplace safety, which includes protocols addressing COVID-19 (Coronavirus). Licensee COVID-19 Standard Operating Procedures should include reports to the Commission of any instance of an employee work-related illness resulting in a confirmed COVID-19 case immediately after obtaining actual knowledge of a confirmed case, but in no event later than twenty-four (24) hours. Licensees are to report this information using the Agent COVID 19 Reporting Form on the Commission website.



## **Operating Policies and Procedures**

### **Personal Policies**

#### **Lowkey Cultivation**

### **MAINTAINING OF FINANCIAL RECORDS**

Lowkey's ("Lowkey Cultivation") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- A. 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.
- B. 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:
    - Assets and liabilities;
    - Monetary transactions;
    - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    - Sales records including the quantity, form, and cost of marijuana products; and
    - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the Lowkey.
- C. All sales recording requirements under 935 CMR 500.140(5) are followed, including:
  - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;

- Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
  - Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
  - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
  - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500; and If collocated with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six (6) months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).
- D. Additional written business records will be kept, including, but not limited to, records of:
- 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);
  - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- E. Application Renewal Records ○
- Lowkey Cultivation shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.
- F. Lowkey Cultivation will have each Lowkey Agent sign and understand that there will be immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to minors. As stated in code 935 CMR 500.105(1)

## **Record-Keeping Procedures**

Lowkey Cultivation will assure record-keeping procedures meet or exceed all Cannabis Control Commission regulations per 935 CMR 500: Adult use of Marijuana. Operating procedures presently in use by Lowkey Cultivation , and in compliance with 105 CMR 725.000: Implementation of an Act for the Humanitarian Medical Use of Marijuana will be updated to meet these standards. All Lowkey Cultivation Records will be available for inspection by the Commission, upon request. In the event Lowkey Cultivation closes, all records will be kept for at least two years at the expense of Lowkey Cultivation .

Records will be maintained in a form and location acceptable to the Commission.

At a minimum, Record Retention policies and procedures will cover the following:

1. Personal Records
2. Financial Records
3. Inventory Records
4. Business Records
5. Waste Disposal Records

### **1. Personal Records**

Lowkey's personnel records include, job descriptions for each employee and volunteer position, well an organizational chart consistent with the job descriptions, and personnel record for each marijuana establishment agent. Personal records will be maintained for at least 12 months after termination of the individual's affiliation with Lowkey Cultivation and will include, at a minimum, the following:

- all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- documentation of verification of references;
- the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- documentation of periodic performance evaluations;
- a record of any disciplinary action taken;
- notice of completed responsible vendor and eight-hour related duty training.
- All background check reports obtained in accordance with 935 CMR 500.030. Additionally, Lowkey has developed a staffing plan that demonstrates accessible business hours and safe cultivation conditions;

### **2. Financial Records**

Lowkey Cultivation financial records will be maintained in accordance with generally accepted accounting principles. Financial records, which shall include manual or computerized. Financial records include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Lowkey Cultivation.

### **3. Inventory Records**

Lowkey Cultivation will not commence adult-use cultivation until approval from the Commission, subject to the limitations in 935 CMR 500.140(10). Lowkey Cultivation will assure to follow laws governing taxation in the Commonwealth, including, but not limited to, the laws regarding taxation, filing audit and seizure.

Lowkey Cultivation will continue to utilize real-time seed-to-sale inventory tracking methodology. Lowkey Cultivation will utilize Seed-to-sale tracking to tag and track all marijuana seeds, clones, plants, and marijuana products intended for sale for adult use or medical use. Such seed-to-sale software will be approved by the Commission. Real-time inventory will be maintained as specified by the Commission, including, at a minimum inventory of:

- marijuana seeds
- marijuana plants in any phase of development such as propagation, vegetation, and flowering
- marijuana ready for dispensing
- all marijuana products
- all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal

Lowkey Cultivation will establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana in the process of cultivation, and finished, stored marijuana.

Lowkey Cultivation will conduct monthly marijuana in the process of cultivation and finished, stored marijuana. Lowkey Cultivation will also conduct annual inventory at least once every

year after the date of the previous comprehensive inventory. Oral devices will not be used for inventory control.

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

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that is not capable of being tested by an Independent Testing Laboratories, except if allowed by 935 CMR 500.000.

#### **4. Business**

Business records may be computerized or manual. Records will include: assets and liabilities; monetary transactions; books of accounts which include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; sales records including the quantity, form, and cost of marijuana products; and salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Lowkey Cultivation.

#### **5. Disposal Records**

Lowkey Cultivation will dispose of all waste as required under 935 CMR 500.105(12). Such records will be maintained for three years.

#### **Diversion Prevention**

Diversion is the illegal taking of medical marijuana from the legal cultivation operation's production or cultivation line or inventory. Any physical moving of marijuana from its assigned and tracked point of origin or current assigned placement in the facility, or attempt thereof is considered diversion or attempted diversion. Further, any unapproved changes to the digital inventory tracking system may constitute attempted diversion and will be investigated.

Lowkey Cultivation cultivation will offer an employee discount of 35% as a way of combating employee theft. Management will also have the option to give small free samples of new products to each employee.

The training will consist of a review of the sections of Act and Regulations pertinent to security, inventory, marijuana storage, diversion detection as well as prevention.

Employees and agents will be informed that diversion of marijuana may result in criminal charges and termination of employment for those individuals who participate, aid in or abet diversion.

Employees and agents will be asked to sign, as a condition of employment, an attestation statement that they are aware of the definition and illegality of diversion.



Our detection training will be achieved by educating employees and agents about the following two methods that will be employed:

***Continuous maintenance of our inventory tracking system:***

- Most losses of marijuana will be red-flagged by the inventory tracking system.
- Regular auditing of inventory of marijuana at the facility will help ensure diversion is either deterred and or discovered.
- Given that some minor deviations in weight are expected due to temperature changes and degradation of flower, we will be observant for patterns indicative of diversion in those deviant weight changes.

**Recognition of signs of diversion:**

- There are many possible signs of diversion including first hand witnessing of a theft however there are possibly subtler indicators such as odd employee behavior or visible changes in plant or batch size.
- Prevention training consists of behaviors and actions that make diversion difficult. Creating a culture of total compliance is only a part of what must be done to prevent diversion. In addition, organization, proper tracking protocols, steady-fast compliance with the Act and managerial intolerance towards unacceptable behaviors and actions help create a stronger deterrent.
- We will also strive to reward employees that achieve higher levels of accuracy in product handling.

**Federal and State Marijuana Laws –**

- All employees and agents will receive a job offer or contract agreement for employment. As part of that offer/agreement we will provide an attestation form which states: “By accepting this position you understand that your employment may be in violation of the Federal Controlled Substances Act, as marijuana manufacturing and possession remain illegal under Federal Law.”
- Employees will be provided a copy of the “Cole Memorandum” issued by the Department of Justice.
- Our company attorney will be contracted to provide a marijuana laws training session for all new employees and agents to ensure they have the necessary and requisite understanding of state and federal laws as they pertain to marijuana.
- All employees and agents will be required to read the CCC Regulations. After completion of this reading they will be required to sign an attestation that they have read and understand their obligations under the Regulations and the Act.

**Standard Operating Procedures Training**

- The company will employ job descriptions for each available position. Each job description will include a list of required standard operating procedures that must be administered to establish core-competency for that position.
- The new hire will receive copies of the required SOPs and will be required to read them prior to taking a written exam. The new hire will not be able to proceed to the hands-on

training curriculum until they have developed core-competency in the required procedures.

If an employee has not developed core-competency for both the hands-on and written curriculums by the end of their probationary period they may be terminated.

## **Employee Theft**

Lowkey Cultivation values all employees and their property, and expects that employees in turn value the company and its assets. Therefore, we will tolerate no employee theft, or stealing of any kind, including fraudulent time card reporting.

- That includes theft of money, information, products, inventory, tools or any item, information or idea that belongs to the company or to an employee, visitor or business partner of the company.
- As such, we expect all incidents of employee theft to be reported immediately to your supervisor or HR representative, along with any data or information you have observed or obtained.

We further retain the right to use video cameras and audio recording methods as well as software to identify and detect employee theft.

Below are examples of types of theft to illustrate prohibited behaviors:

- Employees may not take money, customer credit card numbers or company checks without prior authorization and documentation.
- Employees may not take products without payment, such as inventory, including samples, or broken / returned items or any company equipment or supplies.
- Employees may not give away products or services without prior approval. This includes not giving freebies to friends and family, taking home samples without prior approval, to anyone without documentation and payment.

Employees caught breaking any state or federal law, including employee theft of private or company property or falsifying timekeeping records will be terminated with no warning given.

- In addition a police report may be filed, as well as a potential lawsuit against the employee with a request for restitution of funds or products, inventory or assets.
- To prevent employees from false accusations, we will investigate all claims of theft or employee stealing, and discipline any employee making a false accusation

## **Drug and Substance Policy**

To help ensure a safe, healthy and productive work environment for our employees and others, to protect Company property, and to ensure efficient operations, the Company has adopted a policy of maintaining a workplace free of drugs and alcohol.

This policy applies to all employees and other individuals who perform work for the Company.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, drug paraphernalia or alcohol by an individual anywhere on Company premises, while on Company business (whether on Company premises) or while representing the Company, is strictly prohibited.

Employees and other individuals who work for the Company also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances which may impact an employee's ability to perform his or her job or otherwise pose safety concerns.

- except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work.
- However, this does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test, to the extent an employee is subject to any drug testing requirements, to the extent permitted by and in accordance with applicable law.

This restriction does not apply to responsible drinking of alcohol or ingestion of cannabis at business meetings and related social outings. Violation of this policy will result in disciplinary action, up to and including discharge.

The Company maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history, which reflects treatment for substance abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Company employee, including themselves.

Employees must notify the Company within five calendar days if they are convicted of a criminal drug violation in the workplace. Within ten (10) days of such notification or other actual notice, so that the Company can advise any of Company's clients (including governmental agencies, if applicable) of such conviction as required by contract. All employees are hereby advised that full compliance with the foregoing policy shall be a condition of employment at the Company.

Any employee who violates the foregoing drug-free workplace policy described above shall be subject to discipline up to and including immediate discharge.

In the discretion of the Company, any employee who violates the drug-free workplace policy may be required, in connection with or in lieu of disciplinary sanctions, to participate to the Company's satisfaction in an approved drug assistance or rehabilitation program

## **Covid-19 Agent Reporting Writing**

Lowkey Cultivation will have and follow written operating procedures promoting workplace safety, which includes protocols addressing COVID-19 (Coronavirus). Licensee COVID-19 Standard Operating Procedures should include reports to the Commission of any instance of an employee work-related illness resulting in a confirmed COVID-19 case immediately after obtaining actual knowledge of a confirmed case, but in no event later than twenty-four (24) hours. Licensees are to report this information using the Agent COVID-19 Reporting Form on the Commission website.



## **Energy Compliance Plan**

Energy efficiency and conservation regulations are codified in 935 CMR 500.105, 500.103, 935 CRM 500.105 (15), and 935 CMR 500.120 (11), and/or corresponding medical regulations, as applicable:

1. Remove existing very old lighting and replace it with energy efficient LED lighting.
  2. Remove existing very old windows and replace them with brand new Low-E energy efficient windows.
  3. Utilize as much natural lighting as possible to reduce electricity usage.
  4. Remove any existing very old HVAC system and replace it with an energy efficient HVAC system.
  5. Existing walls and ceilings are insulated. Install insulation with R38 roof and R25 wall insulation value and 6 ½ inches thick on the roof with closed cell insulation and 6 inches thick
  6. All construction to be in compliance with Massachusetts state energy code.
  7. Explore and utilize energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants
- When feasible, Lowkey will aim to exceed energy code.



Lowkey Cultivation, LLC (“Lowkey Cultivation”)  
Management and Operations Profile  
Operating Policies and Procedures

## **Diversity Plan**

### **I. Intent**

Lowkey Cultivation, LLC (“Lowkey Cultivation”) is committed to empowering our employees to thrive in their roles with us. We seek to empower our employees by respecting and appreciating what makes them different, in terms of gender, ethnicity, disability, sexual orientation/identification of veteran status.

Our diversity plan allows for the exploration of these differences in a safe, nurturing and positive environment.

### **II. Purpose**

The purpose of this policy is to outline the responsibilities of Lowkey Cultivation, the Company’s management team and Agents to ensure that Lowkey Cultivation is a diverse and inclusive company that promotes a discrimination-free work environment providing opportunities for all employees to use their diverse talents to support the company’s mission.

Lowkey Cultivation will comply with the requirements of 935 CMR 500.105 (4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Lowkey Cultivation’s Diversity Plan is meant to be an evolving document, and as such, will be evaluated and modified, when necessary, as our company grows and expands.

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



### **III. Proposed Initiatives, Goals and Metrics**

#### *GOAL 1: Recruit and hire a diverse group of employees*

Proposed Initiative: Our goal will be focused to attract and retain qualified employees who are:

- 60 % Minorities,
- 50% Women,
- 20 % Veterans,
- 10 % People with disabilities; and
- 10 % Individuals who are LBGQTQ and/or identify as a non-normative sexual identity.

To achieve this goal, Lowkey Cultivation will:

Create gender-neutral job descriptions;

Employ the services of employment staffing groups – The Viridity Group and Adaptive HR – to assist with recruitment and hiring

Post hiring needs in diverse publications such as a variety of web-based recruitment platforms such as Indeed.com;

Participate in local hiring events and job fairs and hold recruiting events at 1601 Blue Hill Avenue in Mattapan;

Post hiring needs on our company website; and

Attend community group meetings in and around Hyde Park, at least two annually, to introduce Lowkey Cultivation and address our existing hiring needs to attract a diverse array of individuals, with an emphasis on those affiliated with the cannabis industry.

Lowkey Cultivation will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments.

Metrics and Evaluation: Lowkey Cultivation will assess the demographics of its employees to see if it is meeting its goal of increasing diversity in these positions. Lowkey Cultivation will annually analyze the staffing makeup and based upon the outcome of those analytics, determine what steps are necessary to further increase the diversity of Lowkey Cultivation. Lowkey Cultivation will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, Lowkey Cultivation will be able to demonstrate to the Commission the success of this initiative.

*GOAL 2: Encourage Participation Among Employees in Activities Geared Towards Encouraging and Supporting Diversity*

Proposed Initiative: An important way to promote diversity in the workplace is through activities that encourage cultural sensitivity:

Supplemental courses offered regularly on implicit bias and cross-cultural communications;

Additionally, employees at every level of the organization will be encouraged to provide feedback (through surveys and focus groups) on ways to better strengthen company culture in various areas, such as in promoting and sustaining diversity in the workplace;

Our diversity activities will include at minimum the following three activities:

1. Diversity Talks – Through Paired Sessions

Here, we will assign people in pairs to spend 10-15 minutes discussing and listing five (5) things they have in common and five (5) things uncommon between them. After the 10-15 minutes are up, each pair will return the group and share what they learned about each other.

2. Movie Night

Employees will have an opportunity to watch a movie and afterwards discuss some of the relevant cultural themes. We will also provide a suggested reading list to all participants.

We expect to have at least two movie nights annually.

3. Speaker Series

We expect to have at least one annual speaker series

4. Diversity Calendar

We will ask employees to leave suggestions in our feedback box outside management offices for holidays and other dates to add to our diversity calendar, so that we can acknowledge holidays important to our employees.

We expect approximately 25 full and part-time employees to participate in at least two (2) of these activities annually.

Metrics and Evaluation: Lowkey Cultivation will annually analyze the impact and success of implicit bias and cultural sensitivity tailored courses and sessions – through a feedback box outside management offices that asks employees to rank various statements about diversity at the

company on a 1-5 scale, with additional space for comments and suggestions. Based on this feedback, Lowkey Cultivation will make improvements to its diversity processes.

#### **IV. Conclusion**

Lowkey Cultivation supports and encourages a diverse and enjoyable workplace and our Diversity Plan serves as guidance to that end. We will continuously make efforts to improve on this plan, through periodic reviews and amendments, where necessary.