



# Massachusetts Cannabis Control Commission

## Medical Marijuana Treatment Center

### General Information:

License Number: RMD3592  
Original Issued Date: 06/15/2022  
Issued Date: 06/15/2022  
Expiration Date: 06/15/2023

## ABOUT THE MEDICAL MARIJUANA TREATMENT CENTER

Business Legal Name: Nature's Medicines, Inc.

Phone Number: 401-696-8447  
Email Address: jigarp@ammallc.com

Business Address 1: 1045 Quaker Highway  
Business City: Uxbridge Business State: MA Business Zip Code: 01569  
Business Address 2:  
Mailing Address 1: 1045 Quaker Highway  
Mailing City: Uxbridge Mailing State: MA Mailing Zip Code: 02724  
Mailing Address 2:

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

## PERSONS HAVING DIRECT OR INDIRECT CONTROL

### Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control: 100  
Role: Owner Other Role: CEO  
First Name: Jigarkumar Last Name: Patel Suffix:  
Gender: Male User Defined Gender:  
What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)  
Specify Race or Ethnicity: Asian Indian

## ENTITIES HAVING DIRECT OR INDIRECT CONTROL

### Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership:  
Entity Legal Name: Globe Street Management LLC Entity DBA: DBA  
City: City:  
Entity Description: Domestic Limited Liability Company  
Foreign Subsidiary Narrative:  
Entity Phone: 401-696-8447 Entity Email: jigarp@ammallc.com Entity Website:  
Entity Address 1: 971 Providence Road Entity Address 2: Suite 2

Entity City: Whitinsville	Entity State: MA	Entity Zip Code: 01588	Entity Country: USA
Entity Mailing Address 1: 971 Providence Road	Entity Mailing Address 2: Suite 2		
Entity Mailing City: Whitinsville	Entity Mailing State: MA	Entity Mailing Zip Code: 01588	Entity Mailing Country: USA

**Relationship Description:** Globe Street Management, LLC ("Globe Street") serves as the landlord for Nature's Medicines facilities via various executed lease agreements. Globe Street Management is also a lender/debt capital contributor to Nature's Medicines and serves as a management company for Nature's Medicines.

#### CAPITAL RESOURCES - INDIVIDUALS

No records found

#### CAPITAL RESOURCES DOCUMENTATION - INDIVIDUALS

No documents uploaded

#### CAPITAL RESOURCES - ENTITIES

##### Entity Contributing Capital 1

Entity Legal Name: Natures Medicines, Inc.		Entity DBA:	
Email: jigarp@ammallc.com	Phone: 252-864-7405		
Address 1: 4307 E Yellowstone PI		Address 2:	
City: Chandler	State: AZ	Zip Code: 85249	Country: Maricopa
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of Capital Provided: \$500000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

#### CAPITAL RESOURCES DOCUMENTATION - ENTITY

Amounts and Sources of Capital Documentation:

Document Category	Document Name	Type	ID	Upload Date
Existence of Capital Verification	Natures Medicine Letter.pdf	pdf	6147f9ca604619079ab78fb8	09/19/2021

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

##### Business Interest in Other State 1

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

Owner First Name:	Owner Last Name: Patel	Owner Suffix:	
Jigarkumar			
Entity Legal Name: Aumega Health and Wellness, LLC		Entity DBA:	
Entity Description: Owns a dispensary in Pennsylvania			
Entity Phone:	Entity Email:	Entity Website:	
252-864-7405	writejigar@gmail.com		
Entity Address 1: 4307 E Yellowstone PL		Entity Address 2:	
Entity City: Chandler	Entity State: AZ	Entity Zip Code: 85249	Entity Country: United States of America
Entity Mailing Address 1: 4307 E Yellowstone PL		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State: AZ	Entity Mailing Zip Code:	Entity Mailing Country: United States
Chandler		85249	of America

##### Business Interest in Other State 2

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

<b>Owner First Name:</b> Jigarkumar	<b>Owner Last Name:</b> Patel	<b>Owner Suffix:</b>	
<b>Entity Legal Name:</b> Blazin, LLC		<b>Entity DBA:</b>	
<b>Entity Description:</b> Part owner of cultivation facility in Arizona			
<b>Entity Phone:</b> 252-864-7405	<b>Entity Email:</b> writejigar@gmail.com	<b>Entity Website:</b>	
<b>Entity Address 1:</b> 4307 E Yellowstone PL		<b>Entity Address 2:</b>	
<b>Entity City:</b> Chandler	<b>Entity State:</b> AZ	<b>Entity Zip Code:</b> 85249	<b>Entity Country:</b> United States of America
<b>Entity Mailing Address 1:</b> 4307 E Yellowstone PL		<b>Entity Mailing Address 2:</b>	
<b>Entity Mailing City:</b> Chandler	<b>Entity Mailing State:</b> AZ	<b>Entity Mailing Zip Code:</b> 85249	<b>Entity Mailing Country:</b> United States of America

**Business Interest in Other State 3**

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

<b>Owner First Name:</b> Jigarkumar	<b>Owner Last Name:</b> Patel	<b>Owner Suffix:</b>	
<b>Entity Legal Name:</b> Hanuel, LLC		<b>Entity DBA:</b>	
<b>Entity Description:</b> Part owner of a cultivation in Arizona			
<b>Entity Phone:</b> 252-864-7405	<b>Entity Email:</b> writejigar@gmail.com	<b>Entity Website:</b>	
<b>Entity Address 1:</b> 4307 E Yellowstone PL		<b>Entity Address 2:</b>	
<b>Entity City:</b> Chandler	<b>Entity State:</b> AZ	<b>Entity Zip Code:</b> 85249	<b>Entity Country:</b> United States of America
<b>Entity Mailing Address 1:</b> 4307 E Yellowstone PL		<b>Entity Mailing Address 2:</b>	
<b>Entity Mailing City:</b> Chandler	<b>Entity Mailing State:</b> AZ	<b>Entity Mailing Zip Code:</b> 85249	<b>Entity Mailing Country:</b> United States of America

**Business Interest in Other State 4**

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

<b>Owner First Name:</b> Jigarkumar	<b>Owner Last Name:</b> Patel	<b>Owner Suffix:</b>	
<b>Entity Legal Name:</b> Jayara, LLC		<b>Entity DBA:</b>	
<b>Entity Description:</b> Part owner of a cultivation in Arizona			
<b>Entity Phone:</b> 252-864-7405	<b>Entity Email:</b> writejigar@gmail.com	<b>Entity Website:</b>	
<b>Entity Address 1:</b> 4307 E Yellowstone PL		<b>Entity Address 2:</b>	
<b>Entity City:</b> Chandler	<b>Entity State:</b> AZ	<b>Entity Zip Code:</b> 85249	<b>Entity Country:</b> United States of America
<b>Entity Mailing Address 1:</b> 4307 E Yellowstone PL		<b>Entity Mailing Address 2:</b>	
<b>Entity Mailing City:</b> Chandler	<b>Entity Mailing State:</b> AZ	<b>Entity Mailing Zip Code:</b> 85249	<b>Entity Mailing Country:</b> United States of America

**Business Interest in Other State 5**

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

<b>Owner First Name:</b>	<b>Owner Last Name:</b> Patel	<b>Owner Suffix:</b>
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Jigarkumar

**Entity Legal Name:** Marvele, LLC

**Entity DBA:**

**Entity Description:** Part owner of a cultivation in Arizona

**Entity Phone:**

**Entity Email:**

**Entity Website:**

252-864-7405

writejigar@gmail.com

**Entity Address 1:** 4307 E Yellowstone PL

**Entity Address 2:**

**Entity City:** Chandler

**Entity State:** AZ

**Entity Zip Code:** 85249

**Entity Country:** United States of America

**Entity Mailing Address 1:** 4307 E Yellowstone PL

**Entity Mailing Address 2:**

**Entity Mailing City:**

**Entity Mailing State:** AZ

**Entity Mailing Zip Code:**

Chandler

85249

**Entity Mailing Country:** United States of America

#### Business Interest in Other State 6

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:**

**Owner Last Name:** Patel

**Owner Suffix:**

Jigarkumar

**Entity Legal Name:** Rajya, LLC

**Entity DBA:**

**Entity Description:** Part owner of a cultivation in Arizona

**Entity Phone:**

**Entity Email:**

**Entity Website:**

252-864-7405

writejigar@gmail.com

**Entity Address 1:** 4307 E Yellowstone PL

**Entity Address 2:**

**Entity City:** Chandler

**Entity State:** AZ

**Entity Zip Code:** 85249

**Entity Country:** United States of America

**Entity Mailing Address 1:** 4307 E Yellowstone PL

**Entity Mailing Address 2:**

**Entity Mailing City:**

**Entity Mailing State:** AZ

**Entity Mailing Zip Code:**

Chandler

85249

**Entity Mailing Country:** United States of America

#### Business Interest in Other State 7

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:**

**Owner Last Name:** Patel

**Owner Suffix:**

Jigarkumar

**Entity Legal Name:** Swarna, LLC

**Entity DBA:**

**Entity Description:** Owns part of a company that manages cannabis companies across the country

**Entity Phone:**

**Entity Email:**

**Entity Website:**

252-864-7405

writejigar@gmail.com

**Entity Address 1:** 4307 E Yellowstone PL

**Entity Address 2:**

**Entity City:** Chandler

**Entity State:** AZ

**Entity Zip Code:** 85249

**Entity Country:** United States of America

**Entity Mailing Address 1:** 4307 E Yellowstone PL

**Entity Mailing Address 2:**

**Entity Mailing City:**

**Entity Mailing State:** AS

**Entity Mailing Zip Code:**

Chandler

85249

**Entity Mailing Country:** United States of America

#### Business Interest in Other State 8

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:**

**Owner Last Name:** Patel

**Owner Suffix:**

Jigarkumar

**Entity Legal Name:** Amado Management, LLC

**Entity DBA:**

**Entity Description:** A cultivation facility in Arizona

**Entity Phone:** 252-864-7405  
**Entity Email:** writejigar@gmail.com

**Entity Website:**

**Entity Address 1:** 2935 E Frontage Road

**Entity Address 2:**

**Entity City:** Amado **Entity State:** AZ

**Entity Zip Code:** 85645 **Entity Country:** United States of America

**Entity Mailing Address 1:** 2935 E Frontage Road

**Entity Mailing Address 2:**

**Entity Mailing City:** Amado **Entity Mailing State:** AZ

**Entity Mailing Zip Code:** 85645 **Entity Mailing Country:** United States of America

#### Business Interest in Other State 9

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:** Jigarkumar  
**Owner Last Name:** Patel

**Owner Suffix:**

**Entity Legal Name:** Amma Investment Group, LLC

**Entity DBA:**

**Entity Description:** Provides management services to cannabis companies around the country

**Entity Phone:** 252-864-7405  
**Entity Email:** writejigar@gmail.com

**Entity Website:**

**Entity Address 1:** 2439 West McDowell Road

**Entity Address 2:**

**Entity City:** Phoenix **Entity State:** AZ

**Entity Zip Code:** 85009 **Entity Country:** United States of America

**Entity Mailing Address 1:** 2439 West McDowell Road

**Entity Mailing Address 2:**

**Entity Mailing City:** Phoenix **Entity Mailing State:** AZ

**Entity Mailing Zip Code:** 85009 **Entity Mailing Country:** United States of America

#### Business Interest in Other State 10

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:** Jigarkumar  
**Owner Last Name:** Patel

**Owner Suffix:**

**Entity Legal Name:** MJSJ Developement, LLC

**Entity DBA:**

**Entity Description:** Owns part of a company that manages cannabis companies across the country

**Entity Phone:** 252-864-7405  
**Entity Email:** writejigar@gmail.com

**Entity Website:**

**Entity Address 1:** 4307 E Yellowstone PL

**Entity Address 2:**

**Entity City:** Chandler **Entity State:** AZ

**Entity Zip Code:** 85249 **Entity Country:** United States of America

**Entity Mailing Address 1:** 4307 E Yellowstone PL

**Entity Mailing Address 2:**

**Entity Mailing City:** Chandler **Entity Mailing State:** AZ

**Entity Mailing Zip Code:** 85249 **Entity Mailing Country:** United States of America

#### Business Interest in Other State 11

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

**Owner First Name:** Jigarkumar  
**Owner Last Name:** Patel

**Owner Suffix:**

**Entity Legal Name:** Tedra Health, LLC

**Entity DBA:**

**Entity Description:** Applying for a dispensary license in Connecticut

**Entity Phone:**  
**Entity Email:**

**Entity Website:**

252-864-7405 writejigar@gmail.com

Entity Address 1: 2389 Main Street

Entity Address 2:

Entity City: Glastonbury

Entity State: CT

Entity Zip Code: 06033

Entity Country: United States of America

Entity Mailing Address 1: 2389 Main Street

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State: CT

Glastonbury

Entity Mailing Zip Code:

06033

Entity Mailing Country: United States of America

#### Business Interest in Other State 12

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control

Owner First Name:

Owner Last Name: Patel

Owner Suffix:

Jigarkumar

Entity Legal Name: Tedra Health Management, LLC

Entity DBA:

Entity Description: Applying for a dispensary license in Michigan

Entity Phone:

252-864-7405

Entity Email:

writejigar@gmail.com

Entity Website:

Entity Address 1: 4307 E Yellowstone PL

Entity Address 2:

Entity City: Chandler

Entity State: AZ

Entity Zip Code: 85249

Entity Country: United States of America

Entity Mailing Address 1: 4307 E Yellowstone PL

Entity Mailing Address 2:

Entity Mailing City:

Chandler

Entity Mailing State: AZ

Entity Mailing Zip Code:

85249

Entity Mailing Country: United States of America

#### Business Interest in Other State 13

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control

Owner First Name:

Owner Last Name: Patel

Owner Suffix:

Jigarkumar

Entity Legal Name: J Brothers Investments, LLC

Entity DBA:

Entity Description: Owns part of a company applying for a license in Connecticut

Entity Phone:

252-864-7405

Entity Email:

writejigar@gmail.com

Entity Website:

Entity Address 1: 4307 E Yellowstone PL

Entity Address 2:

Entity City: Chandler

Entity State: AZ

Entity Zip Code: 85249

Entity Country: United States of America

Entity Mailing Address 1: 4307 E Yellowstone PL

Entity Mailing Address 2:

Entity Mailing City:

Chandler

Entity Mailing State: AZ

Entity Mailing Zip Code:

85249

Entity Mailing Country: United States of America

#### Business Interest in Other State 14

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control

Owner First Name:

Owner Last Name: Patel

Owner Suffix:

Jigarkumar

Entity Legal Name: Multi Nine, LLC

Entity DBA:

Entity Description: Helps operate a cannabis management company in Maryland

Entity Phone:

252-864-7405

Entity Email:

writejigar@gmail.com

Entity Website:

Entity Address 1: 4307 E Yellowstone PL

Entity Address 2:

<b>Entity City:</b> Chandler	<b>Entity State:</b> AZ	<b>Entity Zip Code:</b> 85249	<b>Entity Country:</b> United States of America
<b>Entity Mailing Address 1:</b> 4307 E Yellowstone PL		<b>Entity Mailing Address 2:</b>	
<b>Entity Mailing City:</b> Chandler	<b>Entity Mailing State:</b> AZ	<b>Entity Mailing Zip Code:</b> 85249	<b>Entity Mailing Country:</b> United States of America

#### Business Interest in Other State 15

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

Owner First Name:	Owner Last Name: Patel	Owner Suffix:	
Jigarkumar			
Entity Legal Name: Six Groove, LLC		Entity DBA:	
Entity Description: Owns part of a company that manages cannabis companies in Massachusetts			
Entity Phone:	Entity Email:	Entity Website:	
252-864-7405	writejigar@gmail.com		
Entity Address 1: 4307 E Yellowstone PL		Entity Address 2:	
Entity City: Chandler	Entity State: AZ	Entity Zip Code: 85249	Entity Country: United States of America
Entity Mailing Address 1: 4307 E Yellowstone PL		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State: AZ	Entity Mailing Zip Code:	Entity Mailing Country: United States
Chandler		85249	of America

#### Business Interest in Other State 16

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

Owner First Name:	Owner Last Name: Patel	Owner Suffix:	
Jigarkumar			
Entity Legal Name: Sixth Street Enterprises, Inc.		Entity DBA:	
Entity Description: Owns two dispensaries in Arizona			
Entity Phone:	Entity Email:	Entity Website:	
252-864-7405	writejigar@gmail.com		
Entity Address 1: 2439 W McDowell Road		Entity Address 2:	
Entity City: Phoenix	Entity State: AZ	Entity Zip Code: 85009	Entity Country: United States of America
Entity Mailing Address 1: 2439 W McDowell Road		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State: AZ	Entity Mailing Zip Code:	Entity Mailing Country: United States
Phoenix		85009	of America

#### Business Interest in Other State 17

**Business Interest of an Entity or Person:** Business interest of any listed person with direct or indirect control

Owner First Name:	Owner Last Name: Patel	Owner Suffix:	
Jigarkumar			
Entity Legal Name: Trydant, LLC		Entity DBA:	
Entity Description: Applying for a license in Michigan			
Entity Phone:	Entity Email:	Entity Website:	
252-864-7405	writejigar@gmail.com		
Entity Address 1: 4307 E Yellowstone PL		Entity Address 2:	
Entity City: Chandler	Entity State: AZ	Entity Zip Code: 85249	Entity Country: United States of America

Entity Mailing Address 1: 4307 E Yellowstone PL		Entity Mailing Address 2:	
Entity Mailing City: Chandler	Entity Mailing State: AZ	Entity Mailing Zip Code: 85249	Entity Mailing Country: United States of America

Business Interest in Other State 18

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control			
Owner First Name: Jigarkumar	Owner Last Name: Patel	Owner Suffix:	
Entity Legal Name: Maryland Health Management, LLC		Entity DBA:	
Entity Description: Provides management services to a dispensary in Maryland			
Entity Phone: 252-864-7405	Entity Email: writejigar@gmail.com	Entity Website:	
Entity Address 1: 2439 W McDowell Road		Entity Address 2:	
Entity City: Phoenix	Entity State: AZ	Entity Zip Code: 85009	Entity Country: United States of America
Entity Mailing Address 1: 2439 W McDowell Road		Entity Mailing Address 2:	
Entity Mailing City: Phoenix	Entity Mailing State: AZ	Entity Mailing Zip Code: 85009	Entity Mailing Country: United States of America

Business Interest in Other State 19

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control			
Owner First Name: Jigarkumar	Owner Last Name: Patel	Owner Suffix:	
Entity Legal Name: PA Natural Medicine LLC		Entity DBA:	
Entity Description: Owns a dispensary in Pennsylvania			
Entity Phone: 252-864-7405	Entity Email: writejigar@gmail.com	Entity Website:	
Entity Address 1: 2439 W McDowell Road		Entity Address 2:	
Entity City: Phoenix	Entity State: AZ	Entity Zip Code: 85009	Entity Country: United States of America
Entity Mailing Address 1: 2439 W McDowell Road		Entity Mailing Address 2:	
Entity Mailing City: Phoenix	Entity Mailing State: AZ	Entity Mailing Zip Code: 85009	Entity Mailing Country: United States of America

Business Interest in Other State 20

Business Interest of an Entity or Person: Business interest of any listed person with direct or indirect control			
Owner First Name: Jigarkumar	Owner Last Name: Patel	Owner Suffix:	
Entity Legal Name: Pure Releaf N Union		Entity DBA:	
Entity Description: Owns a dispensary in Michigan			
Entity Phone: 252-864-7405	Entity Email: writejigar@gmail.com	Entity Website:	
Entity Address 1: 4307 E Yellowstone PL		Entity Address 2:	
Entity City: Chandler	Entity State: AZ	Entity Zip Code: 85249	Entity Country: United States of America
Entity Mailing Address 1: 4307 E Yellowstone PL		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State: AZ	Entity Mailing Zip Code:	Entity Mailing Country: United States



#### DISCLOSURE OF INDIVIDUAL INTERESTS

##### Individual 1

First Name: Jigarkumar	Last Name: Patel	Suffix:
Marijuana Establishment Name: Nature's Medicines, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Uxbridge	Marijuana Establishment State: MA	

##### Individual 2

First Name: Jigarkumar	Last Name: Patel	Suffix:
Marijuana Establishment Name: Nature's Medicines, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Uxbridge	Marijuana Establishment State: MA	

##### Individual 3

First Name: Jigarkumar	Last Name: Patel	Suffix:
Marijuana Establishment Name: Nature's Medicines, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Fall River	Marijuana Establishment State: MA	

##### Individual 4

First Name: Jigarkumar	Last Name: Patel	Suffix:
Marijuana Establishment Name: Nature's Medicines, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Wareham	Marijuana Establishment State: MA	

##### Individual 5

First Name: Jigarkumar	Last Name: Patel	Suffix:
Marijuana Establishment Name: Nature's Medicines, Inc.	Business Type: Other	
Marijuana Establishment City: Fall River	Marijuana Establishment State: MA	

#### PROPERTY DETAILS

Cultivation Address 1: 1045 Quaker Hwy	Cultivation Address 2:
Cultivation City: Uxbridge	Cultivation Zip Code: 01569
Approximate square footage of the Cultivation: 24200	How many abutters does this Cultivation property have?: 2
Have all property abutters have been notified of the intent to open a Marijuana Cultivation at this address?: Yes	
Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft	Cultivation Environment: Indoor

#### MARIJUANA PRODUCTION PROPERTY DETAILS

Production Address 1: 1045 Quaker Hwy	Production Address 2:
Production City: Uxbridge	Production Zip Code: 01569
Approximate square footage of the Production: 24200	How many abutters this production property have?: 2
Have all property abutters have been notified of the intent to open a Marijuana Production at this address?: Yes	

#### MARIJUANA DISPENSING PROPERTY DETAILS

Retail Address 1: 1045 Quaker Hwy	Retail Address 2:
Retail City: Uxbridge	Retail Zip code: 01569
Approximate square footage of the Retail: 2612	How many abutters this Retail property have?: 2

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

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Nature's Medicines_Plan to Remain Compliant with Local Zoning_Uxbridge.pdf	pdf	60f6cf6afb983a0274aafac4	07/20/2021
Certification of Host Community Agreement	HCA Certification Form Uxbridge Nature's Medicine.pdf	pdf	613b5ccfab6739076439fe7a	09/10/2021
Community Outreach Meeting Documentation	Nature's Medicines_Uxbridge MTC_COM Attestation.pdf	pdf	6148c27c179a26079c9e542b	09/20/2021

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	NMI_Plan for Positive Impact.pdf	pdf	61854b52e3155f31cafed1af	11/05/2021

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer Other Role: CEO

First Name: Jigarkumar Last Name: Patel

#### ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Other (specify) Other Role: Landlord for Nature's Medicines' facilities, a debt capital contributor, and a management company

Entity Legal Name: Globe Street Management, LLC Entity DBA:

Entity Description: Domestic Limited Liability Company

Phone: 401-696-8447 Email: jigarp@ammallc.com

Primary Business Address 1: 971 Providence Road

Primary Business Address 2: Suite 2

Primary Business City: Whitinsville Primary Business State: MA

Principal Business Zip Code: 01588 Principal Business Country: USA

Additional Information:

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	06.24.21 Natures Medicines Inc Certificate Of Good Standing.pdf	pdf	60d50576da52e3026d45e1ec	06/24/2021
Articles of Organization	Nature's Medicines_Annual Report 2021 & Articles of Organization.pdf	pdf	60f6d8670bb484027d8c0ba5	07/20/2021
Bylaws	Nature's Medicines_Bylaws.pdf	pdf	60f6d94b84f3fe0296c443b3	07/20/2021
Secretary of Commonwealth -	Nature's Medicines_SoC CoGS	pdf	60ff1c87d07ddc0864d06b46	07/26/2021

Certificate of Good Standing	7.23.2021.pdf			
Department of Unemployment Assistance - Certificate of Good Standing	Nature's Medicines_DUA Cert of Good Standing Attestation.pdf	pdf	6108544aeccced39822b8671	08/02/2021
Department of Unemployment Assistance - Certificate of Good Standing	Globe Street_DUA CoGS_8.2.21.pdf	pdf	6112cd0b72db7037f432c9e2	08/10/2021

No documents uploaded

Massachusetts Business Identification Number: 001179000

Doing-Business-As Name:

DBA Registration City: Uxbridge

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Nature's Medicines_Business Plan.pdf	pdf	60f6d9a823f3f9033f3787e7	07/20/2021
Proposed Timeline	Nature's Medicines_Proposed Timeline.pdf	pdf	60f6d9b484f3fe0296c443b8	07/20/2021
Plan for Liability Insurance	Nature's Medicines_Liability Insurance.pdf	pdf	60f6d9bc1159b60338d5095a	07/20/2021

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	Nature's Medicines_Cultivation Plan.pdf	pdf	60f6d9d0629ad9037af224f6	07/20/2021
Security plan	Nature's Medicines_Security Plan.pdf	pdf	60f6dac574b6080359f730a3	07/20/2021
Prevention of diversion	Nature's Medicines_Prevention of Diversion.pdf	pdf	60f6dacb504b25036f759170	07/20/2021
Storage of marijuana	Nature's Medicines_Storage of Marijuana.pdf	pdf	60f6dae68d6c3f02b7d1e0b0	07/20/2021
Transportation of marijuana	Nature's Medicines_Transportation of Marijuana.pdf	pdf	60f6daec84f3fe0296c443ca	07/20/2021
Inventory procedures	Nature's Medicines_Inventory Procedures.pdf	pdf	60f6daf2da52e3026d4643a3	07/20/2021
Quality control and testing	Nature's Medicines_Quality Control and Testing.pdf	pdf	60f6dafddd0e402a8710e44	07/20/2021
Dispensing procedures	Nature's Medicines_Dispensing Procedures.pdf	pdf	60f6db043678b8028bd4687f	07/20/2021
Personnel policies including background checks	Nature's Medicines_Personnel Policies.pdf	pdf	60f6db0afb983a0274aafb22	07/20/2021
Record Keeping procedures	Nature's Medicines_Recordkeeping Procedures.pdf	pdf	60f6db1784f3fe0296c443ce	07/20/2021
Maintaining of financial records	Nature's Medicines_Maintaining	pdf	60f6db1d308c7a02a1001505	07/20/2021

Financial Records.pdf					
Energy compliance plan	Nature's Medicines_Energy Compliance Plan.pdf	pdf	60f6db2dda52e3026d4643a7	07/20/2021	
Reduced or Free Cost Program for Financial Hardship	Nature's Medicines_Verified Financial Hardship Plan.pdf	pdf	60f6db428d6c3f02b7d1e0b6	07/20/2021	
Description of the types and forms of products manufactured	Nature's Medicines_Types of Products.pdf	pdf	60f6db481159b60338d5096c	07/20/2021	
Method used to produce products	Nature's Medicines_Production Methods.pdf	pdf	60f6db4faa87100331f66c96	07/20/2021	
Samples of unique identifying marks used for branding	Nature's Medicines_Unique Identifying Marks.pdf	pdf	60f6db557a4b3b034a6831fa	07/20/2021	
Qualifications and training	NMI_Qualifications and Training.pdf	pdf	61718f45a99f8607de9bad5a	10/21/2021	
Diversity plan	NMI_Diversity Plan.pdf	pdf	617c61b45ca77d31bb6b082a	10/29/2021	
Method used to produce products	NMI_Safety Plan.pdf	pdf	61854bea6155aa37c4254ea4	11/05/2021	

Do you intend to perform home deliveries?: No

### ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 501.101(1) have been omitted by the applicant from any Medical Marijuana Treatment Center 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 Persons or Entities Having Direct or Indirect Control over the Medical Marijuana Treatment Center and a list of all persons or entities contributing initial capital to operate the Medical Marijuana Treatment Center 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 Medical Marijuana Treatment Center 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.:

I certify that all information contained within this application is true and accurate. I understand and acknowledge that applicants and licensees are required to update information that has changed.: I Agree

### CULTIVATION HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 10:00 PM
Tuesday From: 8:00 AM	Tuesday To: 10:00 PM
Wednesday From: 8:00 AM	Wednesday To: 10:00 PM
Thursday From: 8:00 AM	Thursday To: 10:00 PM
Friday From: 8:00 AM	Friday To: 10:00 PM
Saturday From: 8:00 AM	Saturday To: 10:00 PM
Sunday From: 8:00 PM	Sunday To: 10:00 PM

### PRODUCTION HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 10:00 PM
Tuesday From: 8:00 AM	Tuesday To: 10:00 PM
Wednesday From: 8:00 AM	Wednesday To: 10:00 PM
Thursday From: 8:00 AM	Thursday To: 10:00 PM
Friday From: 8:00 AM	Friday To: 10:00 PM
Saturday From: 8:00 AM	Saturday To: 10:00 PM
Sunday From: 8:00 AM	Sunday To: 10:00 PM

#### DISPENSING HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 10:00 PM
Tuesday From: 8:00 AM	Tuesday To: 10:00 PM
Wednesday From: 8:00 AM	Wednesday To: 10:00 PM
Thursday From: 8:30 AM	Thursday To: 10:00 PM
Friday From: 8:00 AM	Friday To: 10:00 PM
Saturday From: 8:00 AM	Saturday To: 10:00 PM
Sunday From: 8:00 AM	Sunday To: 10:00 PM

## PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Nature's Medicines, Inc. ("Nature's Medicines") will remain compliant at all times with the local requirements applicable to Nature's Medicines' Medical Marijuana Treatment Center located at 1045 Quaker Highway in Uxbridge. In accordance with the Uxbridge Zoning Bylaws, Nature's Medicines Medical Marijuana Treatment Center is located in the Industrial B (I-B) zoning district designated for marijuana facilities. As set forth in the Table of Use Regulations in the Zoning Bylaws, Medical Marijuana Treatment Centers are uses permitted as of right in the I-B zoning district, and no special permit is required.

In compliance with the Commission's regulations, the facility is not located within 500 of an existing public or private school providing education to children in kindergarten or grades 1 through 12. In compliance with the Zoning Bylaws, the facility is also not located within 750 feet of the nearest school providing education for grades K-12.

Nature's Medicines obtained a Building Permit from the Town of Uxbridge Building Department prior to commencing construction and holds a Certificate of Occupancy for its existing operations at the facility. Nature's Medicines will comply with all conditions and standards set forth in any local permit or certificate required to operate the Medical Marijuana Treatment Center.

Nature's Medicines has already attended several meetings with various municipal officials and boards to discuss Nature's Medicines' plans for a proposed Medical Marijuana Treatment Center and has executed a Host Community Agreement with Uxbridge. Nature's Medicines will continue to work cooperatively with various municipal departments, boards, and officials to ensure that Nature's Medicines' Medical Marijuana Treatment Center remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.



## 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):

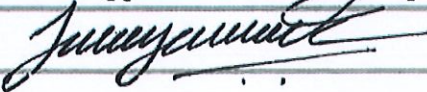
1. Name of applicant:

Nature's Medicines Inc

2. Name of applicant's authorized representative:

Jigarkumar Patel

3. Signature of applicant's authorized representative:




4. Name of municipality:

Uxbridge

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

STEVEN A. SETTE

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).*):

ssette@uxbridge-ma.gov

8. Host community agreement execution date:

9/1/21





# 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:

Worcester Telegram & Gazette

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.



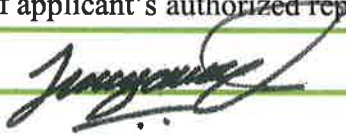
Name of applicant:

Nature's Medicines, Inc.

Name of applicant's authorized representative:

Jigarkumar Patel

Signature of applicant's authorized representative:



**NATURE'S MEDICINES, INC.**  
**VIRTUAL COMMUNITY OUTREACH MEETING**  
**AUGUST 5, 2021**

**Zoom Link:**

<https://us02web.zoom.us/rec/share/6bzfBTAtD2Z3BMdprBtt0U85I987pQXtDTNhUBKb3sdJ8Z8rlMfoDoQ62U9kLA.NrxnTYX2ABbOwaRL>

**Passcode:** e^sXh%+5







**NOTICE OF COMMUNITY OUTREACH MEETING**

Notice is hereby given that Nature's Medicines, Inc. will hold a Virtual Community Outreach Meeting on **August 5, 2021** at 5:00 PM to discuss the proposed siting of a Medical Marijuana Treatment Center at the location of its existing Marijuana Retailer at 1045 Quaker Highway, Uxbridge, MA 01569.

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 *et seq.*

The Virtual Community Outreach Meeting via Zoom is available using the following link: <https://us02web.zoom.us/j/82865275785> or via telephone at 312-626-6799 using Webinar ID: 82865275785#. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting at NMIUxbridge.squarespace.com

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing [rebecca@vicentesederberg.com](mailto:rebecca@vicentesederberg.com) or asked during the meeting after the presentation.

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## **PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT**

### **Overview**

Nature's Medicines, Inc. ("Nature's Medicines") is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

1. Past or present residents of the geographic "areas of disproportionate impact," which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions.

To support such populations, Nature's Medicines has created the following Plan to Positively Impact Areas of Disproportionate Impact (the "Plan") and has identified and created a goal and programs to positively impact past or present residents of the City of Fall River (which the Commission has identified as an area of disproportionate impact).

### **Goals**

In order for Nature's Medicines to positively impact the City of Fall River, Nature's Medicines has established the following goals:

- Providing access for and assisting past or present residents of the City of Fall River to achieve their goal of entering the cannabis industry such that at least 5% of the staff is from Fall River; and
- Supporting past or present residents of the City of Fall River via twice-annual training sessions regarding cannabis business operations.

### **Programs**

Nature's Medicines has developed specific programs to effectuate its stated goal to positively impact residents of Fall River. Such programs will include the following:

- Placing job advertisements for open positions (as they become available but not less than annually) in the Fall River Herald; and
- Holding twice-annual training sessions regarding cannabis business operations for past or present residents of the City of Fall River;
  - Topics for trainings will include cultivation, product manufacturing, and retail best practices and techniques.
  - Each training session will be able to accommodate no fewer than ten (10) individuals and may be held virtually.
  - Training sessions will be advertised in the Fall River Herald.
  - When signing up for the training session, individuals will be asked to identify if they are a past or present resident of the City of Fall River.
  - Upon completion of the training, participants will be informed of any open positions with Nature's Medicines.

### Measurements

The Diversity Manager will administer the Plan and will be responsible for developing measurable outcomes to ensure Nature's Medicines continues to meet its commitments. Such measurable outcomes, in accordance with Nature's Medicines' goals and programs described above, include:

- Ensuring that at least 5% of the staff is from Fall River by providing regular staffing audits of employees hired, retained, and promoted who come from Fall River;
- Documenting any advertisements placed in the Fall River Herald; and
- Documenting any training sessions held, including the topics covered; the number of participants; and any related advertisements placed.

Beginning upon receipt of Nature's Medicines first Provisional License from the Commission to operate a Marijuana Establishment or Medical Marijuana Treatment Center in the Commonwealth, Nature's Medicines will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. Furthermore, the Diversity Manager will review and evaluate Nature's Medicines' measurable outcomes no less than twice annually to ensure that Nature's Medicines is meeting its commitments. Nature's Medicines is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

### Acknowledgements

- Nature's Medicines will adhere to the requirements set forth in 935 CMR 500.105(4) and 935 CMR 501.105(4) which provide the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment and Medical Marijuana Treatment Center.
- Any actions taken, or programs instituted, by Nature's Medicines will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



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

mass.gov/dor

Letter ID: L1316278464  
Notice Date: June 24, 2021  
Case ID: 0-001-216-317



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



NATURE'S MEDICINES, INC.  
482 GLOBE ST  
FALL RIVER MA 02724-2641

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

The Commissioner of Revenue certifies that, as of the date of this certificate, NATURE'S MEDICINES, INC. is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

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

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

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

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

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

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

Minimum Fee: \$15.00

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

**Annual Report**

(General Laws, Chapter 180)

Identification Number: 001179000

Filing for November 1, 2021

In compliance with the requirements of Section 26A of Chapter one hundred and eighty (180) of the General Laws:

1. Exact name of the corporation: NATURE'S MEDICINES, INC.

2. Location of its principal office:

No. and Street: 971 PROVIDENCE ROAD

SUITE 2

City or Town: WHITINSVILLE

State: MA

Zip: 01588

Country: USA

3. DATE OF THE LAST ANNUAL MEETING: 📅 (mm/dd/yyyy)

(if none leave blank)

4. State the names and street addresses of all officers, including all the directors of the corporation, and the date on which the term of office of each expires:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	JIGARKUMAR PATEL	4307 E. YELLOWSTONE PLACE CHANDLER, AZ 85249 USA	2020
TREASURER	JIGARKUMAR PATEL	4307 E. YELLOWSTONE PLACE CHANDLER, AZ 85249 USA	2020
CLERK	JIGARKUMAR PATEL	4307 E. YELLOWSTONE PLACE CHANDLER, AZ 85249 USA	2020
DIRECTOR	JIGARKUMAR PATEL	4307 E. YELLOWSTONE PLACE CHANDLER, AZ 85249 USA	2020

5. Check if the corporation is a cemetery corporation that does NOT hold perpetual care funds in trust. If the corporation is a cemetery corporation that holds perpetual care funds in trust, a copy of the written instrument establishing the trust and any amendments thereto must be attached, and the annual report must be filed by facsimile, mail or in person. ☐

I, the undersigned, JIGARKUMAR PATEL of the above-named business entity, in compliance with the General Laws, Chapter 180, hereby certify that the above information is true and correct as of the dates shown. IN WITNESS WHEREOF AND UNDER PENALTIES OF PERJURY, I hereto sign my name on this 30 Day of March, 2021.





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

Minimum Fee: \$35.00

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

**Articles of Organization**

(General Laws, Chapter 180)

Identification Number: 001179000

**ARTICLE I**

The exact name of the corporation is:

XIPHIAS WELLNESS, INC.

**ARTICLE II**

The purpose of the corporation is to engage in the following business activities:

TO ENGAGE IN CIVIC, EDUCATIONAL, AND BENEVOLENT ACTIVITIES PER MGL CH. 180 §4.

**ARTICLE III**

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

MAY BE SET FORTH IN BY-LAWS.

**ARTICLE IV**

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:

*(If there are no provisions state "NONE")*

1. MEETINGS OF DIRECTORS AND OFFICERS ARE AUTHORIZED TO TAKE PLACE ANYWHERE WITHIN THE UNITED STATES. 2. THE DIRECTORS MAY MAKE, AMEND, OR REPEAL THE BY-LAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY LAW, THE ARTICLES OF ORGANIZATION, OR THE BY-LAWS REQUIRE ACTION BY THE DIRECTORS. 3. NO DIRECTOR SHALL BE PERSONALLY LIABLE TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED HOWEVER THAT THIS PROVISION SHALL NOT ELIMINATE THE LIABILITY OF A DIRECTOR, TO THE EXTENT THAT SUCH LIABILITY IS IMPOSED BY APPLICABLE LAW; A. FOR ANY BREACH OF THE DIRECTORS DUTY OF LOYALTY TO THE CORPORATION. B. FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR KNOWING VIOLATION OF LAW; AND C. FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT.

Notes: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

## ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

## ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

06/25/2015

## ARTICLE VII

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

**a. The street address (*post office boxes are not acceptable*) of the principal office of the corporation in *Massachusetts* is:**

No. and Street: 408 DOUGLAS STREET  
City or Town: UXBRIDGE State: MA Zip: 01569 Country: USA

**b. The name, residential street address and post office address of each director and officer of the corporation is as follows:**

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Expiration of Term
PRESIDENT	DAVID A BRAYTON III	68 WILLIAM BARTON DRIVE TIVERTON, RI 02878 USA 68 WILLIAM BARTON DRIVE TIVERTON, RI 02878 USA	2016
TREASURER	STEVEN J CROTEAU	408 DOUGLAS STREET UXBRIDGE, MA 01569 USA 408 DOUGLAS STREET UXBRIDGE, MA 01569 USA	2016
CLERK	VINCENT FORTE	93 RHODE ISLAND AVENUE NEWPORT, RI 02840 USA 93 RHODE ISLAND AVENUE NEWPORT, RI 02840 USA	2016
DIRECTOR	NICOLE R CROTEAU	408 DOUGLAS STREET UXBRIDGE, MA 01569 USA 408 DOUGLAS STREET UXBRIDGE, MA 01569 USA	2016
DIRECTOR	JOHN FARIA	330 SOUTH CHRISTOPHER AVENUE TIVERTON, RI 02878 USA 330 SOUTH CHRISTOPHER AVENUE TIVERTON, RI 02878 USA	2016
DIRECTOR	STEVEN J CROTEAU	408 DOUGLAS STREET UXBRIDGE, MA 01569 USA 408 DOUGLAS STREET UXBRIDGE, MA 01569 USA	2016
DIRECTOR	VINCENT FORTE	93 RHODE ISLAND AVENUE NEWPORT, RI 02840 USA 93 RHODE ISLAND AVENUE NEWPORT, RI 02840 USA	2016
DIRECTOR	JOANNE LEPPANEN	81 STATE STREET APT 1S NEW BEDFORD, MA 02740 USA 81 STATE STREET APT 1S NEW BEDFORD, MA 02740 USA	2016
DIRECTOR	JAMIE DESOUSA	528 COTTAGE STREET	2016

		PAWTUCKET, RI 02861 USA 528 COTTAGE STREET PAWTUCKET, RI 02861 USA	
DIRECTOR	DAVID A BRAYTON III	68 WILLIAM BARTON DRIVE TIVERTON, RI 02878 USA 68 WILLIAM BARTON DRIVE TIVERTON, RI 02878 USA	2016

**c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:**  
December

**d. The name and business address of the resident agent, if any, of the business entity is:**

Name: STEVEN CROTEAU  
No. and Street: 119 NORTH MAIN STREET  
City or Town: UXBRIDGE State: MA Zip: 01569 Country: USA

**I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:**

**IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 25 Day of June, 2015. (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)**

DAVID A. BRAYTON, III, PRESIDENT/DIRECTOR



THE COMMONWEALTH OF MASSACHUSETTS

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

June 25, 2015 10:23 AM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

**SECOND AMENDED AND RESTATED BYLAWS  
OF NATURE'S MEDICINES, INC.**

**ARTICLE I  
GENERAL**

**Section 1.01 Name and Purposes.** The name of the corporation is NATURE'S MEDICINES, INC. (the "Company"). The purpose of the Company shall be as set forth in the Company's Articles of Organization as adopted and filed with the Office of the Secretary of the Commonwealth of Massachusetts (as now in effect or as hereafter amended or restated from time to time, the "Articles of Organization"). As permitted by law, the Company may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a nonprofit corporation formed under Chapter 180 of the General Laws of Massachusetts ("Chapter 180").

**Section 1.02 Articles of Organization.** These Bylaws (these "Bylaws"), the powers of the Company and its board of directors (the "Board"; each such member comprising the Board, a "Director"), and all matters concerning the conduct and regulation of the business of the Company, shall be subject to the provisions in regard thereto that may be set forth in the Articles of Organization. In the event of any conflict or inconsistency between the Articles of Organization and these Bylaws, the Articles of Organization shall control.

**Section 1.03 Corporate Seal.** The Board may adopt and alter the seal of the Company. The seal of the Company, if any, shall, subject to alteration by the Board, bear the Company's name, the word "Massachusetts," and the year of the Company's incorporation.

**Section 1.04 Fiscal Year.** The fiscal year of the Company shall commence on the first (1<sup>st</sup>) day of January and end on the following thirty-first (31<sup>st</sup>) day of December of each year, unless otherwise determined by the Board.

**Section 1.05 Location of Principal Office.** The principal office of the Company shall be located at such place within the Commonwealth of Massachusetts as shall be fixed from time-to-time by the Board, and if no place is fixed by the Board, such place as shall be fixed by the President of the Company.

**ARTICLE II  
MEMBERS**

**Section 2.01 Sole Member.** The sole member of the Company shall be Jigarkumar Patel (the "Sole Member"). In the event the Sole Member resigns, is removed for willful misconduct, dies, or becomes incapacitated, the Board shall be vested with exclusive authority to appoint a substitute Member (as such term is defined herein), subject to the terms and conditions, including terms and conditions with respect to voting rights, as the Board may determine to be appropriate at the time of such appointment.

**Section 2.02 Additional and Substitute Members.** The Sole Member may increase the number of Members of the Company and may appoint additional Members and substitute

Members on such terms and conditions, including terms and conditions related to voting rights, as the Sole Member may from time-to-time determine ("Additional Members"). Rights conferred upon an Additional Member by the Sole Member, including voting rights, need not be uniform for all Additional Members. As used in these Bylaws, the term "Member(s)" shall refer only to the Sole Member (including a substitute Member for the Sole Member), unless and until the Sole Member acts to designate one (1) or more Additional Members as specified in these Bylaws, at which time the term "Member(s)" shall refer to the Sole Member and the Additional Members collectively. If at any time, due to the resignation, removal, death, or incapacity of a Member, no Members remain constituent to the Company, the Board is vested with the exclusive authority to appoint a substitute Member, subject to such terms and conditions, including terms and conditions with respect to voting rights, as the Board may determine to be appropriate at the time of such appointment.

**Section 2.03 Tenure.** Unless the length of term is enumerated at the time an Additional Member is admitted by the Sole Member, for so long as a Member continues to comply with the qualifications, rules, and regulations applicable to serving as a Member of the Company as shall be established from time-to-time by the Members, each such Member shall continue to be a Member in good standing until such Member resigns, is removed, dies, is incapacitated, or otherwise is disqualified.

**Section 2.04 Resignation.** Any Member may resign by delivering a written resignation to the President or Clerk of the Company, to the Board, or to the principal office of the Company. Such resignation shall be effective upon receipt, unless specified to be effective at a later date, and acceptance thereof shall not be necessary to make it effective; *provided, however*, that the non-resigning Members may act to accept such resignation immediately or at any other time sooner than the time specified by such resigning Member in their resignation.

**Section 2.05 Annual Meeting.** The annual meeting of the Members shall be held on such day and at such hour as may be specified in the notice of such meeting designated by the Members. In the event that the annual meeting is not held on such date, a special meeting in lieu thereof may be held with all of the force and effect of an annual meeting.

**Section 2.06 Special Meetings.** Special meetings of the Members may be called by the Members, the President, or a majority of the Directors, and shall be noticed by the Clerk, or in the case of the death, absence, incapacity, or refusal by the Clerk, by any other officer of the Company.

**Section 2.07 Notice.** A written notice of the date, place, and hour of all meetings stating the purposes of the meeting shall be given by the Clerk (or any other officer) at least seven (7) calendar days before the meeting to the Members. The Members may waive notice either before or after the meeting.

**Section 2.08 Action by Written Consent.** Any action required or permitted to be taken at any meeting of the Members may be taken without a meeting and without notice if the Members consent to the action in writing and the written consent is filed with the records of the meetings of the Members. Such consent shall be treated for all purposes as a vote at a meeting.

**Section 2.09 Action at Meetings.** Except as otherwise provided by law, the Articles of Organization, or these Bylaws, at all meetings of the Members, a majority vote of the Members then in office shall constitute a transaction of business, and the majority vote of the Members shall be an act of the Members. A Member may adjourn any meeting to another time, date, and place. Each Member shall be entitled to one (1) vote on any matter that comes before the Members.

**Section 2.10 Electronic Participation.** Unless otherwise provided by law or the Articles of Organization, Members may participate in a meeting by means of a conference telephone or similar communications equipment so that all persons participating in the meeting can hear each other at the same time and participation by such means shall constitute presence in person at the meeting.

**Section 2.11 Powers of the Members.** In addition to and without limiting the powers, rights, and privileges the Members shall have that are afforded to members of a Company organized under Chapter 180, the Articles of Organization, these Bylaws, and other applicable law, the actions and powers of the Company listed below shall be reserved exclusively to the Members:

- (a) Amend or amend and restate the Articles of Organization; *provided*, that any amendment of the Articles of Organization shall require a two-thirds ( $\frac{2}{3}$ ) vote of the Members.
- (b) Adopt, amend, or repeal these Bylaws.
- (c) Appoint, remove, or suspend any Director of the Company.
- (d) Change the number of individuals comprising the Board.
- (e) Approve any sale or other disposition of all, or substantially all, of the assets or operations of the Company.
- (f) Approve any merger or consolidation of the Company; *provided*, that any merger or consolidation shall require a two-thirds ( $\frac{2}{3}$ ) vote of the Members.
- (g) Approve any plan of dissolution of the Company, or other action related to the dissolution or liquidation of the Company.
- (h) Appoint, suspend, or remove a Member of the Company.
- (i) Authorize the Company to enter into any agreement to do any of the foregoing.

### **ARTICLE III DIRECTORS**

**Section 3.01 Number of Directors.** The authorized number of Directors of the Company shall be not less than one (1) and not greater than nine (9) until changed by an amendment to these Bylaws adopted in accordance with these Bylaws by the vote or written consent of a majority of the outstanding shares entitled to vote. Within the limits specified herein, the number of Directors of the Company shall be determined solely in the discretion of the Board.

Directors need not be residents of the Commonwealth of Massachusetts, nor a Shareholder of the Company.

**Section 3.02 Powers.** All corporate power shall be exercised by or under the authority of, and the business and affairs of the Company shall be managed under the direction of, the Board, except such powers expressly conferred upon or reserved to the Shareholders, and subject to any limitations set forth by law, the Articles of Organization, or these Bylaws.

**Section 3.03 Term of Office.** Directors shall hold office until the next annual meeting of the Shareholders and until their respective successors are elected and qualified, or until their earlier respective death, resignation, disqualification, or removal.

**Section 3.04 Vacancies and Newly Created Directorships.** Vacancies and newly created directorships, whether resulting from an increase in the size of the Board, from the death, resignation, disqualification, or removal of a Director, or otherwise, may be filled solely by the affirmative vote of a majority of the remaining Directors then in office, even though less than a quorum of the Board. A Director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

**Section 3.05 Removal.** The Board may declare vacant the office of a Director who has been declared of unsound mind by an order of the court or convicted of a felony, or who has been barred from ownership or participation in a cannabis business by a final decision of an applicable state or local licensing authority, or otherwise in a manner provided by law.

Any or all of the Directors may be removed from office, without cause, at any duly called meeting of the Shareholders by a vote of the Shareholders so entitled to elect such Director(s). If one (1) or more Directors are so removed at a meeting of the Shareholders, the Shareholders may elect new Directors at the same meeting for the purpose of replacing such removed Director(s).

**Section 3.06 Resignation.** A Director may resign effective on giving written notice to the President of the Company, unless the notice specifies a later effective date.

**Section 3.07 Meetings of Directors.**

(a) **Regular Meetings.** A regular annual meeting of the Board shall be held immediately after, and at the same place as, the annual meeting of the Shareholders, for the purpose of electing officers and transacting any other business. The Board may provide for other regular meetings from time-to-time by resolution.

(b) **Special Meetings.** Special meetings of the Board for any purpose or purposes may be called at any time by the President of the Company, a Vice President of the Company (if any), the chairperson of the Board (if any), the Secretary of the Company, by any two (2) Directors or by one (1) Director (in the event that there is only one (1) Director). Notice of the time and place of special meetings of the Board shall be delivered by mail, electronic delivery, or orally to each Director and the Secretary of the Company. If notice is mailed, such notice shall be deposited in the United States mail at least two (2) days before the time of the special meeting of the Board. In the case the notice is delivered

either orally or by electronic delivery, such notice shall be delivered at least forty-eight (48) hours before the time of the special meeting of the Board. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director whom the person giving notice has reason to believe will promptly communicate such notice to the Director. The notice need not specify the purpose of the special meeting of the Board nor the place if it is to be held at the principal office of the Company.

(c) **Place of Meetings.** Meetings of the Board may be held at any place within or without the Commonwealth of Massachusetts that has been designated in the notice. If a place has not been stated in the notice or if there is no notice, meetings of the Board shall be held at the principal office of the Company unless another place has been designated by a resolution duly adopted by the Board.

**Section 3.08 Electronic Participation.** Directors may participate in a meeting through conference telephone, electronic video screen communication, or other electronic transmission by and to the Company. Participation in a meeting of the Board by conference telephone or electronic video screen communication constitutes presence in person as long as all Directors participating can hear one another. Participation by other electronic transmission by and to the Company (other than conference telephone or electronic video screen communication) constitutes presence in person at the meeting as long as participating Directors can communicate with other participants concurrently, each Director has the means to participate in all matters before the Board, including the ability to propose or object to a specific corporate action, and the Company implements some means of verifying that each person participating is entitled to participate and all votes or other actions are taken by persons entitled to participate.

**Section 3.09 Quorum of and Action by the Board.** A majority of the authorized number of Directors constitutes a quorum of the Board for the transaction of business. Every act or decision done or made by a majority of those Directors present at a meeting of the Board duly held at which a quorum is present is the act of the Board, unless Chapter 156D or the Articles of Organization require a greater number. A meeting of the Board at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action is approved by at least a majority of those Directors who constitute the required quorum for such meeting of the Board. A quorum of Directors may adjourn any meeting of the Board to meet again at a stated time and place. In the absence of quorum, a majority of those Directors present at a meeting of the Board may adjourn such meeting from time-to-time. Notice of the time and place of a meeting of the Board that has been adjourned for more than twenty-four (24) hours shall be given to those Directors not present at the time of the adjournment.

**Section 3.10 Compensation.** Directors may receive compensation for their services and the Board may authorize payment of a fixed fee and expenses of attendance, if any, for attendance at any meeting of the Board or committee thereof. A Director shall not be precluded from serving the Company in any other capacity and receiving compensation for services in such capacity. The Board may, from time-to-time, establish compensation policies of the Company consistent with this Section 3.10.

**Section 3.11 Action by the Board Without a Meeting.** Any action required or permitted to be taken by the Board or any committee thereof under Chapter 156D may be taken without a meeting if, prior or subsequent to the action, a consent or consents thereto by all of the Directors then in office, or all of the committee members then appointed, is filed with the Secretary of the Company to be filed with the minutes of the proceedings of the Board. Such action by written consent shall have the same force and effect as a unanimous vote of the Board.

**Section 3.12 Committees of the Board.** The Board, by resolution adopted by a majority of the authorized number of Directors comprising the Board, may designate one (1) or more committees, each consisting of two (2) or more Directors, to serve at the pleasure of the Board and to exercise the authority of the Board to the extent provided in the resolution establishing the committee and as permitted by law. The Board may adopt governance rules for any committee consistent with these Bylaws. The provisions of these Bylaws applicable to meetings and actions of the Board shall govern meetings and actions of each committee, with the necessary changes made to substitute the committee and its members for the Board and its members as appropriate.

A committee of the Board shall not have the authority to:

- (a) approve actions that require approval of the Shareholders or the outstanding shares;
- (b) fill vacancies on the Board or in any committee thereof;
- (c) amend or repeal bylaws or adopt new bylaws;
- (d) amend or repeal any resolution of the Board that by its terms is not so amendable or repealable; or
- (e) make a distribution to Shareholders, except at a rate, in a periodic amount, or within a price range set forth in the Articles of Organization or as determined by the Board.

The Board, by resolution adopted by the majority of the authorized number of Directors comprising the Board, may designate one (1) or more Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of such committee or for the purposes of any written action by such committee.

The designation of a committee of the Board and the delegation thereto of authority shall not operate to relieve the Board, or any Director, of any responsibility imposed by law.

## **ARTICLE IV OFFICERS**

**Section 4.01 Positions and Election.** The officers of the Company shall be elected by the Board and shall consist of a President, a Secretary, a Treasurer, and all other officers as may from time-to-time be determined by the Board. At the discretion of the Board, the Company may also have other officers, including but not limited to one (1) or more Vice Presidents or Assistant Vice Presidents, one (1) or more Assistant Secretaries, a Chief Financial Officer, and a Chief

Operations Officer, as may be appointed by the Board, with such authority as may be specifically delegated to such officers by the Board. Any two (2) or more offices may be held by the same person.

Each officer shall serve until a successor is elected and qualified or until the earlier death, resignation, disqualification, or removal of such officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board.

**Section 4.02 Removal and Resignation.** Any officer elected or appointed by the Board may be removed with or without cause by the affirmative vote of the majority of the Board. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer elected or appointed by the Board may resign at any time by giving written notice to the Company. Unless a different time is specified in the notice, such resignation shall be effective upon its receipt by the President of the Company, the Secretary of the Company, or the Board.

**Section 4.03 Powers and Duties of Officers.** The powers and duties of officers of the Company shall be as provided from time-to-time by resolution of the Board or by direction of an officer authorized by the Board to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Company, subject to the control of the Board.

## **ARTICLE V**

### **INDEMNIFICATION OF DIRECTORS AND OFFICERS**

**Section 5.01 Indemnification of Officers or Directors.** The Company shall, to the extent permitted under Chapter 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Company, and their respective heirs, executors, administrators, successors, and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding, or judgment that may have been asserted against any such persons, or in which such persons are made parties by reason of their being or having been officers of the Company. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit, or proceeding that these persons are liable for negligence or misconduct in the performance of duty.

**Section 5.02 Non-Exclusivity of Indemnification Rights and Authority to Insure.** The foregoing rights of indemnification and advancement of expenses shall be in addition to and not exclusive of any other rights to which any person may be entitled pursuant to any agreement with the Company, or under any statute, provision of the Articles of Organization, or any action taken by the Board or the Shareholders.

The Company may buy and maintain insurance to protect itself and any agent against any expense asserted against them or incurred by an agent, whether or not the Company could indemnify the agent against the expense under applicable law or the provisions of this Article V.



## **ARTICLE VI SHARE CERTIFICATES AND TRANSFER**

**Section 6.01 Share Certificates.** Shares of the Company may, but need not, be represented by certificates. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. For all shares issued or transferred without certificates, the Company shall, within a reasonable time after such issuance or transfer, send the respective Shareholder a written statement of the information required on share certificates pursuant to Chapter 156D, § 6.25(b) & (c) and § 6.27. Shareholders can request and obtain a statement of rights, restrictions, preferences, and privileges regarding classified shares or a class of shares with two (2) or more series, if any, from the Company's principal office. Each certificate issued shall bear all statements or legends required by law to be affixed thereto.

**Section 6.02 Transfer of Shares.** [No shares of common stock of the Company may be subject to Transfer (as such term is defined hereunder) without the approval of no less than unanimous consent of the Board. Notwithstanding any other provision of these Bylaws, each Shareholder agrees that it will not, directly or indirectly, Transfer any of its shares or share equivalents, and the Company agrees that it shall not issue any shares or share equivalents, if such Transfer would cause the Company to be unfit for licensure by the applicable cannabis regulatory body or otherwise subject to the applicable cannabis regulatory body for disciplinary action. In any event, the Board may refuse the Transfer of shares to any person if such Transfer would have a material adverse effect on the Company as a result of any regulatory or other restrictions imposed by any governmental authority.

Transfer of shares of the Company shall be made only on the books of the Company by the registered holder thereof or by such other person as may under law be authorized to endorse such shares for Transfer, or by such Shareholder's attorney thereunto authorized by power of attorney duly executed and filed with the Secretary of the Company or transfer agent of the Company. Except as otherwise provided by law, upon surrender to the Company or its transfer agent of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment, or authority to Transfer, it shall be the duty of the Company to issue a new certificate to the person entitled thereto, cancel the old certificate, and record the transaction upon its books.

**"Transfer"** means to, directly or indirectly, sell, transfer, assign, pledge, encumber, hypothecate, or similarly dispose of, either voluntarily or involuntarily, by operation of law or otherwise, or to enter into any contract, option, or other arrangement or understanding with respect to the sale, transfer, assignment, pledge, encumbrance, hypothecation, or similar disposition of, any shares owned by a person or any interest (including a beneficial interest) in any shares or share equivalents owned by a person.

**Section 6.03 Registered Shareholders.** The Company may treat the holder of record of any shares issued by the Company as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, Transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with

respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth of Massachusetts, or giving proxies with respect to those shares.

**Section 6.04 Lost, Stolen, or Destroyed Certificates.** The Board may issue a new share certificate in place of any certificate the Board previously issued that the Shareholder alleges to have been lost, stolen, or destroyed; *provided*, that that Shareholder or Shareholder's legal representative of the lost, stolen, or destroyed certificate shall give the Company a bond or other adequate security sufficient to indemnify the Company against any potential claim against the Company because of the alleged loss, theft, or destruction of any such certificate or the issuance of such new certificate.

## **ARTICLE VII CORPORATE RECORDS AND INSPECTION**

**Section 7.01 Records.** The Company shall maintain adequate and correct books and records of account, minutes of the proceedings of the Shareholders, the Board, and committees of the Board, and a record of its Shareholders, including names and addresses of all Shareholders and the number and class of shares held, along with any other records required by law. The Company shall keep such record of its Shareholders at its principal office, as fixed by the Board from time-to-time, or at the office of the Company's transfer agent or registrar. The Company shall keep its books and records of account and minutes of the proceedings of the Shareholders, the Board, and committees of the Board at the Company's principal office or such other location as shall be designated by the Board from time-to-time.

**Section 7.02 Inspection of Books and Records.** The Company's accounting books and records and minutes of proceedings of the Shareholders, the Board, and committees of the Board shall, and to the extent provided by law, be open to inspection of Directors, Shareholders, and voting trust certificate holders, in the manner provided by law.

**Section 7.03 Certification of Inspection of Bylaws.** The Company shall keep in its principal office the original or a copy of these Bylaws as amended or otherwise altered to date, which shall be open to inspection by the Shareholders at all reasonable times during office hours.

## **ARTICLE VIII MISCELLANEOUS**

**Section 8.01 Checks, Drafts, Etc.** All checks, drafts, or other instruments for payment of money or notes of the Company shall be signed by an officer or officers, or any other person or persons, as shall be determined from time-to-time by resolution of the Board.

**Section 8.02 Conflict with Applicable Law or Articles of Organization.** Unless the context requires otherwise, the general provisions, rules of construction, and the definitions of Chapter 156D shall govern the construction of these Bylaws. These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

**Section 8.03 Invalid Provisions.** If any one (1) or more provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make such provision or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

**Section 8.04 Emergency Management of the Company.** In anticipation of or during an emergency, as defined in Chapter 156D § 3.03(d), the Board, in order to conduct the ordinary business affairs of the Company, shall modify procedures, including but not limited to, calling a meeting of the Board, quorum requirements for such meeting of the Board, and designation of additional or substitute Directors; *provided*, that such modifications may not conflict with the Articles of Organization.

In anticipation of or during an emergency, the Company shall be able to take any and all of the following actions to conduct the Company's ordinary business affairs and operations:

- (a) modify lines of succession to accommodate the incapacity of any Director, officer, employee, or agent resulting from the emergency;
- (b) relocate the principal office or designate alternative principal offices or regional offices;
- (c) give notice to Directors in any practicable matter under the circumstances, including but not limited to publication and radio, when notice of a meeting of the Board cannot be given in a manner prescribed by these Bylaws; and
- (d) deem that one (1) or more officers present at a meeting of the Board is a Director as necessary to achieve a quorum for such meeting of the Board.

**Section 8.05 Reports.** The Company shall provide all Shareholders with notice of the availability of annual financial reports of the Company before the earlier of (i) the annual meeting of the Shareholders or (ii) one hundred and twenty (120) days after the close of the fiscal year. Such financial reports shall be prepared and provided to the Shareholders upon request in compliance with Chapter 156D, § 16.20.

**Section 8.06 Advisement of Counsel.** THE CULTIVATION, PRODUCTION, AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR THE COMPANY, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

## **ARTICLE IX AMENDMENT OF BYLAWS**

**Section 9.01 Amendment by Shareholders.** Shareholders may adopt, amend, or repeal these Bylaws by the vote or written consent of the holders of a majority of the outstanding shares entitled to vote, except as otherwise provided by law, these Bylaws, or the Articles of Organization.

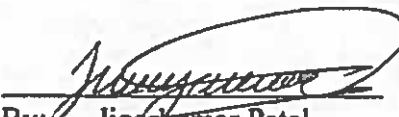
**Section 9.02 Amendment by Directors.** Subject to the rights of Shareholders as provided in Section 9.01, and the statutory limitations of Chapter 156D, the Board may adopt, amend, or repeal these Bylaws.

**CERTIFICATE OF SECRETARY  
OF  
NATURE'S MEDICINES, INC.**

The undersigned, Jigarkumar Patel, hereby certifies that he is the duly elected and acting Secretary of NATURE'S MEDICINES, INC. a Massachusetts non-profit corporation (the "Company"), and that the foregoing Bylaws were adopted as the Bylaws of the Company as of the 10<sup>th</sup> day of February, 2020, and that the same do now constitute the Bylaws of the Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Secretary on behalf of the Company as of this 10<sup>th</sup> day of February, 2020.

NATURE'S MEDICINES, INC.

  
By: Jigarkumar Patel  
Its: Secretary



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: July 23, 2021

To Whom It May Concern :

I hereby certify that according to the records of this office,  
**NATURE'S MEDICINES, INC.**

is a domestic corporation organized on **June 25, 2015**

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 180 section 26 A, for revocation of the charter of said corporation; that the State Secretary has not received notice of dissolution of the corporation pursuant to Massachusetts General Laws, Chapter 180, Section 11, 11A, or 11B; that said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

*William Francis Galvin*

Secretary of the Commonwealth

Certificate Number: 21070543510

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

Processed by: NMa

**Certificate of Good Standing or Compliance from the Massachusetts  
Department of Unemployment Assistance Attestation Form**

Signed under the pains and penalties of perjury, I, Jigarkumar Patel, an authorized representative of Nature's Medicines, Inc., certify that Nature's Medicines, Inc. does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.

  
Signature

08/02/2021  
Date

Name: Jigarkumar Patel

Title: President

Entity: Nature's Medicines, Inc.



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



362998742

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

Globe Street Management LLC  
120 N 44th St Ste 410  
Phoenix, AZ 85034-1822

EAN: 22106857  
August 02, 2021

Certificate Id:50056

The Department of Unemployment Assistance certifies that as of 8/2/2021 ,Globe Street Management LLC is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

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

Richard A. Jeffers, Director

Department of Unemployment Assistance



### **EXECUTIVE SUMMARY**

Nature's Medicines, Inc. ("Nature's Medicines") is an applicant for a Medical Marijuana Treatment Center in the Commonwealth that is committed to creating a safe and clean community environment and that provides consistent, high quality cannabis to registered, qualifying patients and their caregivers.

#### **What Drives Us**

Nature's Medicines' goals include:

1. Providing patients with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of Nature's Medicines' operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly MTC.

### **COMPANY DESCRIPTION**

#### **Structure**

Nature's Medicines is a Massachusetts not-for-profit corporation that is applying for a License from the Commission to operate a MTC in the Commonwealth.

Nature's Medicines will file, in a form and manner specified by the Commission, an application for licensure as a MTC consisting primarily of three sections: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

#### **Operations**

Nature's Medicines will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana products in the process of cultivation and finished, stored marijuana; conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

Nature's Medicines will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for medical use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 501.000.

Nature's Medicines will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 501.000.

Nature's Medicines will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 501.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, Nature's Medicines will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Nature's Medicines will keep reports documenting compliance with 935 CMR 501.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 501.000.

Nature's Medicines will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 501.105 and 501.110.

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

Nature's Medicines will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 501.105(15) as part of its operating plan and application for licensure.

Prior to commencing operations, Nature's Medicines will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 501.000 or the cessation of operation of Nature's Medicines. If Nature's Medicines is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 501.105 unless Nature's Medicines has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

Nature's Medicines and Nature's Medicines agents will comply with all local rules, regulations, ordinances, and bylaws.

## **Security**

Nature's Medicines will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

Nature's Medicines' state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Apart from registered, qualifying patients and caregivers, only Nature's Medicines' registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and Nature's Medicines will maintain a current list of individuals with access. Nature's Medicines will have security personnel on-site during business hours.

On-site consumption of marijuana will be prohibited.

## **Benefits to Host Communities**

Nature's Medicines looks forward to working cooperatively with its host communities to ensure that Nature's Medicines operates as a responsible, contributing member of those host communities. Nature's Medicines has established a mutually beneficial relationship with its host communities in exchange for permitting Nature's Medicines to site and operate.

Nature's Medicines' host communities stand to benefit in various ways, including but not limited to the following:

1. **Jobs**: An MTC will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. **Monetary Benefits**: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
3. **Access to Quality Product**: Nature's Medicines will allow registered, qualifying patients in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
4. **Control**: In addition to the Commission, the Police Department and other municipal departments will have oversight over Nature's Medicines' security systems and processes.

5. Responsibility: Nature's Medicines is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. Economic Development: Nature's Medicines' operation of its facilities will help to revitalize its host communities and contribute to the overall economic development of the local community.

## **MARKET RESEARCH**

### **Customers**

Nature's Medicines will only sell marijuana and marijuana products to other licensed MTCs (in accordance with transfer limits) and individuals that possess an active medical registration card issued by the Commission.

### **Competitive Advantage**

Nature's Medicines' competitive advantages over their competition include the extensive experience of its executive management team in the cannabis industry, including operational experience in other states.

Nature's Medicines possesses several strengths that separate Nature's Medicines from the competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the services offered, the location of the dispensary, the prices offered for the products, and the branding of the business.

### **Regulations**

Nature's Medicines is a Massachusetts not-for-profit corporation. Nature's Medicines will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. Nature's Medicines will apply for all state and local permits and approvals required to build out and operate the facility.

Nature's Medicines will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

### **Products & Services**

In addition to traditional sativa, indica, and hybrid cannabis flower, Nature's Medicines will offer a wide range of products that will allow Nature's Medicines to serve customers with a wide variety of needs. Products Nature's Medicines intends to offer include, but will not be limited to:

1. Concentrates
2. Topical Salves
3. Creams and Lotions
4. Patches
5. Oral Mucosal and Sublingual Dissolving Tablets
6. Tinctures
7. Sprays
8. Inhalation Ready to Use CO2 Extracted Hash Oils
9. Pre-Dosed Oil Vaporizers

- 10. Ingestion Capsules
- 11. Infused Food and Beverages

#### Pricing Structure

Nature's Medicines' pricing structure will vary based on market conditions. Nature's Medicines plans to provide products of superior quality and will price accordingly. Nature's Medicines will also have a plan to provide discounts to patients with Verified Financial Hardship.

### **MARKETING & SALES**

#### Growth Strategy

Nature's Medicines' plan to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;
3. An exemplary customer in-store experience; and
4. A caring and thoughtful staff made of consummate professionals.

Nature's Medicines plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of patients in the future.

#### Communication

Nature's Medicines will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use for patients. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 501.105(5), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising, and branding produced by or on behalf of Nature's Medicines will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."

Nature's Medicines will seek events where 85% or more of the audience is reasonably expected to be either 21 years of age or older or individuals with a debilitating condition, as determined by reliable, current audience composition data. At these events, Nature's Medicines will market its products and services to reach a wide range of patients.

Nature's Medicines will communicate with patients through:

1. A company run website;
2. A company blog;
3. Popular cannabis discovery networks such as WeedMaps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications.

Nature's Medicines will provide a catalogue and a printed list of the prices and strains of marijuana available to patients and will post the same catalogue and list on its website and in the retail store.

### Sales

Nature's Medicines will sell its products and services by engaging customers with knowledgeable personnel.

Nature's Medicines will ensure that all marijuana products that are provided for sale to patients are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for patients, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for patients in multiple servings will allow a patient to easily perform the division into single servings. Edible marijuana products in a solid form will be easily and permanently scored to identify individual servings. Notwithstanding 935 CMR 501.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product will be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored will be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to Licensees. Each single serving of an edible marijuana product contained in a multiple-serving package may be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 501.105(5) that indicates that the single serving is a Marijuana Product. Serving size will be determined by Nature's Medicines.

### Logo

Nature's Medicines has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

The logo is discreet, unassuming, and does not use marijuana symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

An image of the logo can be found below:





## **FINAL REMARKS**

Nature's Medicines has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. Nature's Medicines hopes to bring its high-quality standards to medical-use patients to provide them with a safe and clean community environment. Nature's Medicines' security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

## PLAN FOR OBTAINING LIABILITY INSURANCE

Nature's Medicines, Inc. ("Nature's Medicines") will contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Nature's Medicines will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, Nature's Medicines will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Nature's Medicines will keep reports documenting compliance with 935 CMR 501.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 501.000.

## QUALITY CONTROL AND TESTING

### Quality Control

Nature's Medicines, Inc. ("Nature's Medicines") will comply with the following sanitary requirements:

1. Any Nature's Medicines agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Nature's Medicines agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - a. Maintaining adequate personal cleanliness; and
  - b. 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.
3. Nature's Medicines' 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 Nature's Medicines' 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;
4. Nature's Medicines' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Nature's Medicines will ensure that litter and waste is properly removed and disposed of so as 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 501.105(12);
6. Nature's Medicines' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Nature's Medicines' facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Nature's Medicines' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Nature's Medicines will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Nature's Medicines acknowledges and understands that the Commission may require Nature's Medicines to demonstrate the intended and actual use of any toxic items found on Nature's Medicines' premises;

11. Nature's Medicines will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Nature's Medicines' needs;
12. Nature's Medicines' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the MTC. Plumbing will properly convey sewage and liquid disposable waste from the MTC. There will be no cross-connections between the potable and wastewater lines;
13. Nature's Medicines will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Nature's Medicines will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Nature's Medicines will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

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

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

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 501.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Nature's Medicines will process marijuana in a safe and sanitary manner. Nature's Medicines will process the leaves and flowers of the female marijuana plant only, which will be:

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

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 501.105(5) and 501.105(6).

When selling or otherwise transferring marijuana to another MTC, Nature's Medicines will provide documentation of its compliance with the testing requirements of 935 CMR 501.160 and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

### Testing

Nature's Medicines will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 501.000. No marijuana product will be sold or otherwise marketed for medical use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 501.160.

Any Independent Testing Laboratory relied upon by Nature's Medicines for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 501.100, or formerly and validly registered by the Department of Public Health; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

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

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

Nature's Medicines' policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 501.160 will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating

that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Nature's Medicines and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Nature's Medicines will maintain testing results in compliance with 935 CMR 501.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. Nature's Medicines acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year will be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 501.105(13). All storage of Nature's Medicines' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 501.105(11). All excess marijuana will be disposed in compliance with 935 CMR 501.105(12), either by the Independent Testing Laboratory returning excess marijuana to Nature's Medicines for disposal or by the Independent Testing Laboratory disposing of it directly. Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.



## PERSONNEL POLICIES

### Overview

Nature's Medicines, Inc. ("Nature's Medicines") will securely maintain personnel records, including registration status and background check records. Nature's Medicines will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each MTC agent;
- A staffing plan that will demonstrate accessible business hours and safe operating conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 501.030.

### Agent Personnel Records

In compliance with 935 CMR 501.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with Nature's Medicines and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 501.030;
- 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; and
- Results of initial background investigation, including CORI reports.

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

### Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for Nature's Medicines will undergo a detailed background investigation prior to being granted access to a Nature's Medicines facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Nature's Medicines pursuant to 935 CMR 501.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a MTC agent with the licensee.

- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 501.030, Nature's Medicines will consider:
  - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
  - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
  - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 501.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 501.800. In addition to the requirements established in 935 CMR 501.800, Nature's Medicines will:
  - a. Comply with all guidance provided by the Commission and 935 CMR 501.802: Table B to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
  - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 501.802. In the event a Presumptive Negative Suitability Determination is made, Nature's Medicines will consider the following factors:
    - i. Time since the offense or incident;
    - ii. Age of the subject at the time of the offense or incident;
    - iii. Nature and specific circumstances of the offense or incident;
    - iv. Sentence imposed and length, if any, of incarceration, if criminal;
    - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
    - vi. Relationship of offense or incident to nature of work to be performed;
    - vii. Number of offenses or incidents;
    - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
    - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
    - x. Any other relevant information, including information submitted by the subject.
  - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary

Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 501 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Nature's Medicines or the Commission.

Personnel Policies and Training

As outlined in Nature's Medicines' Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 501.105(9) and will be made available to the Commission, upon request. All Nature's Medicines agents are required to complete training as detailed in Nature's Medicines' Qualifications and Training plan which includes but is not limited to Nature's Medicines' strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the MTC and a comprehensive discussion regarding the MTC's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 501.105(9)(d)(2)(d).

Nature's Medicines will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to Nature's Medicines operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

## RECORDKEEPING PROCEDURES

### General Overview

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

### Recordkeeping

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

- Corporate Records

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

- Insurance Coverage:
  - Directors & Officers Policy
  - Product Liability Policy
  - General Liability Policy
  - Umbrella Policy
  - Workers Compensation Policy
  - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
  - Annual Agent Registration
  - Annual MTC Registration
- Local Compliance:
  - Certificate of Occupancy
  - Special Permits
  - Variances
  - Site Plan Approvals
  - As-Built Drawings
- Corporate Governance:
  - Annual Report
  - Secretary of Commonwealth Filings

- Business Records

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

- Assets and liabilities;
- Monetary transactions;

- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Nature's Medicines.
- Personnel Records

At a minimum, Personnel Records will include:

  - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
  - A personnel record for each MTC agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Nature's Medicines and will include, at a minimum, the following:
    - All materials submitted to the Commission pursuant to 935 CMR 501.030(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; and
    - A record of any disciplinary action taken.
    - Notice of completed responsible vendor and eight-hour related duty training.
  - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  - Personnel policies and procedures; and
  - All background check reports obtained in accordance with 935 CMR 501.030: Registration of MTC Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
  - Nature's Medicines will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
  - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
  - Nature's Medicines will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 501.105(8)(b), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as

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

- Sales Records

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

- Incident Reporting Records

- Within ten (10) calendar days, Nature's Medicines will provide notice to the Commission of any incident described in 935 CMR 501.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
- All documentation related to an incident that is reportable pursuant to 935 CMR 501.110(9)(a) will be maintained by Nature's Medicines for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Nature's Medicines' jurisdiction on request.

- Visitor Records

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

- Waste Disposal Records

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

- Security Records

- A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
- Recordings from all video cameras which will be enabled to record twenty-four (24) hours each day will be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
- Recordings will not be destroyed or altered and will be retained as long as necessary if Nature's Medicines is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

- Transportation Records
  - Nature's Medicines will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
  - Records that any and all of Nature's Medicines' vehicles are properly registered, inspected, and insured in the Commonwealth and will be made available to the Commission on request.
- Agent Training Records
  - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Closure
  - In the event Nature's Medicines closes, all records will be kept for at least two (2) years at Nature's Medicines' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Nature's Medicines will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

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

  - Security measures in compliance with 935 CMR 501.110;
  - Employee security policies, including personal safety and crime prevention techniques;
  - A description of Nature's Medicines' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 501.000.
  - Storage of marijuana in compliance with 935 CMR 501.105(11);
  - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
  - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
  - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 501.105(8) and (9);
  - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 501.160;
  - A staffing plan and staffing records in compliance with 935 CMR 501.105(9)(d);
  - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
  - Alcohol, smoke, and drug-free workplace policies;
  - A plan describing how confidential information will be maintained;
  - Policy for the immediate dismissal of any dispensary agent who has:
    - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;



- Engaged in unsafe practices with regard to Nature’s Medicines operations, which will be reported to the Commission; or
  - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Nature’s Medicines, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Nature’s Medicines’ website.
- Policies and procedures for the handling of cash on Nature’s Medicines premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana.
- Policies and procedures for energy efficiency and conservation that will include:
  - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
  - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures will include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
  - Nature’s Medicines will keep and submit as a component of the renewal application documentation that the MTC requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the MTC, which would include the city’s or town’s anticipated and actual expenses resulting from the operation of the MTC in its community. Nature’s Medicines will 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 will be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

### Record-Retention

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

## MAINTAINING FINANCIAL RECORDS

Nature's Medicines, Inc.'s ("Nature's Medicines") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Medical Use of Marijuana regulations (935 CMR 501.000). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 501.105(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 Nature's Medicines.
- All sales recording requirements under 935 CMR 501.140 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;
  - Prohibiting the use of software or other methods to manipulate or alter sales data;
  - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
    - If Nature's Medicines 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: 1. it will immediately disclose the information to the Commission; 2. it will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 501.105.
  - 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 501.000; and

- If co-located with a marijuana establishment, 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 501.140(10).
- 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 501.105(10) and all bond or escrow requirements under 935 CMR 501.105(16);
  - Fees paid under 935 CMR 501.005 or any other section of the Commission's regulations; and
  - Fines or penalties, if any, paid under 935 CMR 501.360 or any other section of the Commission's regulations.
- License Renewal Records
  - Nature's Medicines will keep and submit as a component of the renewal application documentation that the MTC requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the MTC, which would include the city's or town's anticipated and actual expenses resulting from the operation of the MTC in its community. Nature's Medicines will 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 will be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

## ENERGY COMPLIANCE PLAN

### Overview

Policies and procedures for energy efficiency and conservation that will include:

1. Identification of potential energy use reduction opportunities (including, but not limited to, natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
2. Consideration of opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
3. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
5. MTCs engaged in transportation operations will use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

To demonstrate compliance with 935 CMR 501.120(11), an MTC applicant seeking to engage in cultivation operations must submit an energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation, together with submission of building plans under 935 CMR 501.103(1)(a), but prior to final licensure. To the extent updates are required to the information provided for initial licensure, Nature's Medicines will submit an updated energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation, together with a renewal application submitted under 935 CMR 501.103(4) and 935 CMR 501.103(4).

### Cultivation Operations

Nature's Medicines' cultivation operations will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management, and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control as a condition of obtaining a final License under 935 CMR 501.103(2) and as a condition of renewal under 935 CMR 501.103(4). Nature's Medicines' cultivation operations will adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable departments or divisions of the EOEEA, to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and will provide energy and water usage reporting to the Commission in a form determined by the Commission. Each License renewal application under 935 CMR 501.103(4) must include a report of Nature's Medicines' cultivation operations' energy and water usage over the 12-month period preceding the date of application

For purposes of 935 CMR 501.120(11), the following terms will have the following meanings:

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

#### Product Manufacturing Operations

An MTC engaged in product manufacturing operations will meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable departments or divisions of the EOEEA to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts

#### Building Code Requirements

Nature's Medicines' cultivation facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: *State Building Code*, unless Nature's Medicines' facility uses an existing building and may demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.

#### Lighting

Nature's Medicines' Lighting Power Densities (LPD) for cultivation space will not exceed an average of 36 watts per gross square foot of active and growing space canopy, but for Tier 1 and Tier 2 a requirement of 50 watts per gross square foot of active canopy or growing unless otherwise determined in guidelines issued by the Commission.

All horticultural lighting used in the facility will be listed on the current Design Lights Consortium Solid-State Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission as of the date of License application, and lighting Photosynthetic Photon Efficacy (PPE) is at least 15 % above the minimum Horticultural QPL threshold rounded up to the nearest 0.1  $\mu\text{mol/J}$  (micromoles per joule).

If Nature's Medicines is looking to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission, Nature's Medicines will seek a waiver pursuant to 935 CMR 501.850: Waivers and provide documentation of third-party certification of the energy efficiency features of the proposed lighting. All facilities, regardless of compliance path, will provide third-party safety certification by an OSHA NRTL or SCC-recognized body,

which will certify that products meet a set of safety requirements and standards deemed applicable to horticultural lighting products by that safety organization.

### HVAC

Nature's Medicines' Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: *State Building Code*), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: *State Building Code*). Nature's Medicines will provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code and that these systems have been evaluated and sized for the anticipated loads of the facility.

### Safety Protocols

Nature's Medicines has established and documented safety protocols to protect workers and patients (*e.g.*, eye protection near operating grow light), as further described in the Workplace Safety Plan.

Nature's Medicines will document renewable or alternative energy credits that represent a portion of the energy usage not generated onsite, has been purchased and retired yearly.

Before final licensure Nature's Medicines will demonstrate compliance with 935 CMR 501.120(11), by submitting an energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation and submission of building plans under 935 CMR 501.100.

The Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55, § 78(b). Nature's Medicines will regularly check for such guidelines and continue to follow the Commission's standards.



## VERIFIED FINANCIAL HARDSHIP PLAN

### Overview

Nature's Medicines, Inc. ("Nature's Medicines") is committed to assisting registered, qualifying patients that have verified financial hardship with obtaining access to medical marijuana and marijuana products needed to treat the symptoms of their debilitating medical conditions.

To support such patients, and in accordance with 935 CMR 501.050(1)(h), Nature's Medicines has created the following Plan to Provide Marijuana to Patients with Verified Financial Hardship (the "Plan").

### Goal

In order to increase patient access to medical marijuana and marijuana products, Nature's Medicines will offer a ten percent (10%) discount on all orders of marijuana, marijuana products, and marijuana accessories used for consumption for all registered, qualifying patients with verified financial hardship.

### Program

Nature's Medicines has developed a detailed program to effectuate its stated goal of providing reduced cost marijuana, marijuana products and marijuana accessories to all registered, qualifying patients with a documented verified financial hardship.

As defined in 935 CMR 501.002, an individual with a verified financial hardship includes: (1) a recipient of MassHealth; (2) a recipient of Supplemental Security Income; or (3) an individual with an income that does not exceed 300% of the Federal Poverty Level, adjusted for family size.

Any registered, qualifying patient that meets the Commission's definition of an individual with a "verified financial hardship" and provides sufficient supporting documentation will be eligible for the discount, which will be applied at the point of sale.

Nature's Medicines will provide registered, qualifying patients with a Verified Financial Hardship Affidavit Form to determine whether the patient has a verified financial hardship. The Verified Financial Hardship Affidavit Form will request that patients provide proof of a verified financial hardship by submitting a copy of one or more of the following documents:

1. Valid MassHealth card issued by the Commonwealth of Massachusetts;
2. Supplemental Security Income benefit verification letter; or
3. State or Federal tax return from the current year or previous year, including all attachments, to determine if income exceeds 300% of the Federal Poverty Level.

An alternate price list for marijuana, marijuana products, and marijuana accessories that reflects the reduced prices available for patients with verified financial hardship will be made available to patients inside Nature's Medicines' retail dispensary and on Nature's Medicines' website.

A copy of this Plan and the Verified Financial Hardship Affidavit Form will also be made available inside the retail dispensary and on Nature's Medicines' website.

### Measurements

The General Manager will administer the Plan and will be responsible for developing measurable outcomes to ensure Nature's Medicines continues to meet its commitments. Such measurable outcomes, in accordance with Nature's Medicines' goals and programs described above, include:

1. Documenting the registered qualifying patients that submit a Verified Financial Hardship Affidavit Form and the type of supporting documentation;
2. Documenting the registered qualifying patients with verified financial hardships that qualify for the discount; and
3. Documenting the amount of each discount provided to patients with verified financial hardships.

Beginning upon Nature's Medicines' receipt of notice from the Commission to commence retail medical marijuana operations, Nature's Medicines will utilize the proposed measurements to assess its Plan. The General Manager will review and evaluate Nature's Medicines' measurable outcomes no less than twice per year to ensure that Nature's Medicines is meeting its commitments and will update the Plan based on feedback from registered patients and the Cannabis Control Commission, as applicable.

### Acknowledgements

- Nature's Medicines will adhere to the requirements set forth in 935 CMR 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Medical Marijuana Treatment Center.
- Any actions taken, or programs instituted, by Nature's Medicines will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

## QUALIFICATIONS AND TRAINING

Nature's Medicines, Inc. ("Nature's Medicines") will ensure that all employees hired to work at a Nature's Medicines facility will be qualified to work as a MTC agent and properly trained to serve in their respective roles in a compliant manner.

### Qualifications

In accordance with 935 CMR 501.030, a candidate for employment as a MTC agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Nature's Medicines will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 501.802. In the event that Nature's Medicines discovers any of its agents are not suitable for registration as a MTC agent, the agent's employment will be terminated, and Nature's Medicines will notify the Commission within one (1) business day that the agent is no longer associated with the MTC.

### Training

As required by 935 CMR 501.105(2), and prior to performing job functions, each of Nature's Medicines' agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. At a minimum, MTC Agents will receive a total of eight (8) hours of training annually. The eight-hour total training requirement will be tailored to the roles and responsibilities of the job function of each MTC Agent. A minimum of four (4) hours of training will be from Responsible Vendor Training Program courses established under 935 CMR 501.105(2)(b). Any additional RVT hours over the four-hour RVT requirement may count toward the eight-hour total training requirement. Non-RVT training may be conducted in-house by the MTC or by a third-party vendor engaged by the MTC. Basic on-the-job training MTCs provide in the ordinary course of business may be counted toward the eight-hour total training requirement. Training must include training on confidentiality, privacy, security, and other topics as specified by the Commission and as per 935 CMR 501.105(2). MTC Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission.

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

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

As part of the Responsible Vendor Training Program, Nature's Medicines' agents will receive training on a variety of topics relevant to MTC operations, including but not limited to the following:

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

## **DIVERSITY PLAN**

### **Overview**

Nature's Medicines, Inc. ("Nature's Medicines") is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

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

To support such populations, Nature's Medicines has created the following Diversity Plan (the "Plan") and has identified and created the following goal and programs to promote equity in Nature's Medicines' operations.

### **Goal**

In order for Nature's Medicines to promote equity for the above-listed groups in its operations, Nature's Medicines has established the following goal:

- Ensuring that our workforce is comprised of at least 15% minorities; at least 50% women; at least 10% veterans; at least 10% people with disabilities; and at least 10% people who identify as LGBTQ+; and
- Donating no less than \$2,500.00 to the New Bedford Chapter of the NAACP annually.

### **Programs**

Nature's Medicines has developed specific programs to effectuate its stated goal to promote diversity and equity in its operations, which will include the following:

1. Distributing quarterly internal workplace newsletters that encourage current employees to recommend individuals falling into the above-listed demographics for employment;
2. Posting open positions (as they become available, but not less than annually) with diverse job boards, including DiversityJobs.com and HirePurpose.com; and
3. Contributing no less than \$2,500.00 annually to the New Bedford chapter of the NAACP.<sup>1</sup>

### **Measurements**

The Diversity Manager will administer the Plan and will be responsible for developing measurable outcomes to ensure Nature's Medicines continues to meet its commitments. Such measurable outcomes, in accordance with Nature's Medicines' goal and programs described above, include:

- Undergoing a staffing analysis to determine the composition of Nature's Medicines' workforce;
- Documenting any internal workplace newsletters that solicit referrals for employment;
- Documenting each job advertisement placed with diverse job boards;

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<sup>1</sup> Note that this \$2,500.00 amount is intended to apply to the totality of Nature's Medicines licenses, rather than being on a per-license basis.

- Documenting all payments made to the New Bedford Chapter of the NAACP.

Beginning upon receipt of Nature's Medicines' first Provisional License from the Commission to operate a Marijuana Establishment or a Medical Marijuana Treatment Center in the Commonwealth, Nature's Medicines will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Diversity Manager will review and evaluate Nature's Medicines' measurable outcomes no less than twice annually to ensure that Nature's Medicines is meeting its commitments.

#### Acknowledgements

- As identified above, Nature's Medicines intends to support the New Bedford Chapter of the NAACP and acknowledges that the NAACP has been contacted and will receive the support described herein.
- Nature's Medicines will adhere to the requirements set forth in 935 CMR 500.105(4) and 935 CMR 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment and Medical Marijuana Treatment Center.
- Any actions taken, or programs instituted, by Nature's Medicines will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



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**TO WHOM IT MAY CONCERN**

April 25, 2019

Be advised that the New Bedford Branch of the NAACP is willing to accept donations from Nature's Medicine, a Registered Marijuana Facility.

Sincerely,

**LaSella Hall**

President, New Bedford NAACP

**Rene Ledbetter**

Vice-President, New Bedford NAACP

*LaSella L. Hall, NAACP New Bedford President*  
*Rene Ledbetter*  
*VP NAACP New Bedford*