



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC283481  
Original Issued Date: 07/28/2021  
Issued Date: 07/28/2021  
Expiration Date: 07/28/2022

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Riverside Cannabis LLC

Phone Number: 413-250-6104  
Email Address: damaris.aponte42@gmail.com

Business Address 1: 1 Cabot Street  
Business City: Holyoke  
Business State: MA  
Business Zip Code: 01040  
Business Address 2:  
Mailing Address 1: 1 Cabot Street  
Mailing City: Holyoke  
Mailing State: MA  
Mailing Zip Code: 01040  
Mailing Address 2:

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: no  
Priority Applicant Type: RMD Priority  
Economic Empowerment Applicant Certification Number:  
RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:  
Department of Public Health RMD Registration Number:  
Operational and Registration Status:  
To your knowledge, is the existing RMD certificate of registration in good standing?:  
If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100  
Percentage Of Control: 100

Role: Owner / Partner	Other Role:	
First Name: Damaris	Last Name: Aponte	Suffix:
Gender: Female	User Defined Gender:	
What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)		
Specify Race or Ethnicity:		

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Damaris	Last Name: Aponte	Suffix:
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of the Capital Provided: \$3500 Percentage of Initial Capital: 100
Capital Attestation: Yes		

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1 Cabot Street	
Establishment Address 2:	
Establishment City: Holyoke	Establishment Zip Code: 01040
Approximate square footage of the Establishment: 12250	How many abutters does this property have?: 30
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	
Cultivation Tier:	Cultivation Environment:

#### FEE QUESTIONS

Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft.	Cultivation Environment: Indoor
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#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Riverside - Plan to Remain Compliant with Local Zoning.pdf	pdf	607dcbc28bb25444af301c0a	04/19/2021
Community Outreach Meeting Documentation	Riverside - Outreach Attestation.pdf	pdf	6093fbc0d91389075ed39667	05/06/2021
Certification of Host Community Agreement	Riverside Cannabis - HCA Certification signed.pdf	pdf	609aad26954bd3079c6916c6	05/11/2021

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

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Riverside - PIP - RFI 5.11.21.pdf	pdf	609aaeaf85675207abc7b2a0	05/11/2021

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

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

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Riverside Cannabis - Cert. of Organization.pdf	pdf	607df76bcefab844e67157bc	04/19/2021
Department of Revenue - Certificate of Good standing	riverside cannabis dept of revenue good standing.pdf	pdf	607f26f221aec245a96cc315	04/20/2021
Department of Revenue - Certificate of Good standing	DUA Cert of Good Standing Attestation (1).pdf	pdf	608031abbd015444c5505808	04/21/2021
Bylaws	Riverside Cannabis LLC - Single Member Operating Agreement (1).pdf	pdf	608031bd16d4db44ccf5969a	04/21/2021
Secretary of Commonwealth - Certificate of Good Standing	riverside sec of state.jpg	jpeg	60808595518b4d44994186e7	04/21/2021

No documents uploaded

Massachusetts Business Identification Number: 001496812

Doing-Business-As Name:

DBA Registration City: Holyoke

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Riverside - Plan for Obtaining Liability Insurance.pdf	pdf	608033338bb25444af302262	04/21/2021

Proposed Timeline	Riverside - Timeline.pdf	pdf	608034229cefd04567d4f5e3	04/21/2021
Business Plan	Riverside Business Plan - RFI 5.11.21.pdf	pdf	609aafab3bbe600765b4e5b4	05/11/2021

## OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	Riverside - Policies and Procedures for Cultivating.pdf	pdf	607f35195997354560766722	04/20/2021
Restricting Access to age 21 and older	Riverside - Plan for Restricting Access to Age 21 and Older.pdf	pdf	607f38bfa6d53445a21e5a7d	04/20/2021
Security plan	Riverside - Security Plan.pdf	pdf	607f39ba86f403457678e44f	04/20/2021
Prevention of diversion	Riverside - Prevention of Diversion.pdf	pdf	607f39cc8d8557457dbb9e81	04/20/2021
Storage of marijuana	Riverside - Storage of Marijuana.pdf	pdf	607f39d63a37ef458c087934	04/20/2021
Transportation of marijuana	Riverside - Transportation of Marijuana.pdf	pdf	607f39e4a6d53445a21e5a83	04/20/2021
Inventory procedures	Riverside - Inventory Procedures.pdf	pdf	607f39f28bb25444af3020ad	04/20/2021
Quality control and testing	Riverside - Quality Control and Testing.pdf	pdf	607f3a192e84db44a04c946a	04/20/2021
Personnel policies including background checks	Riverside - Personnel Policies Including Background Checks.pdf	pdf	607f3a55599735456076673c	04/20/2021
Record Keeping procedures	Riverside - Recordkeeping Procedures.pdf	pdf	607f3a6316d4db44ccf594de	04/20/2021
Maintaining of financial records	Riverside - Maintaining of Financial Records.pdf	pdf	607f3a6b7eb80444db469100	04/20/2021
Qualifications and training	Riverside - Qualifications and Training.pdf	pdf	607f3a908bb25444af3020b1	04/20/2021
Energy Compliance Plan	Riverside - Energy Compliance Plan.pdf	pdf	607f3a9b5997354560766742	04/20/2021
Diversity plan	Riverside Diversity RFI 05.11.21.pdf	pdf	609ac521b15b200795552d6f	05/11/2021

## ATTESTATIONS

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

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

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

Notification:

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

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

### **PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING**

Riverside Cannabis LLC (“**Riverside**”) will remain compliant at all times with the local zoning requirements set forth in the City of Holyoke Zoning Ordinance. In accordance with the Table of Uses in Section 4.3 and Section 7.10 pertaining to Marijuana Facilities, Riverside’s proposed Marijuana Cultivator is allowed by City Council Special Permit within the General Industry (“**IG**”) Zoning District. Riverside must act on this permit within two calendar years or receive an extension.

In compliance with Section 7.10.4 of the Ordinance, the property is not located within 200 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12.

Riverside will apply for any other local permits required to operate at the proposed location, including a Building Permit and Certificate of Occupancy. Riverside will comply with all conditions and standards set forth in any local permit required to operate a at its proposed location.

Riverside has already attended several meetings with various municipal officials and boards to discuss Riverside’s plans and has executed a Host Community Agreement with Holyoke. Riverside will continue to work cooperatively with various municipal departments, boards, and officials to ensure that Riverside’s facility remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

# 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): 5/5/21
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

4/16/21

b. Name of publication:

Holyoke Sun

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:

4/23/21

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

a. Date notice(s) mailed:

4/19/21

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





Name of applicant:

Riverside Cannabis LLC

Name of applicant's authorized representative:

Damaris Aponte

Signature of applicant's authorized representative:

*Damaris Aponte*

Please be advised that this meeting was held in person.  
No video recording has been provided. There were 15  
attendees.



## RACING, from page 9

and after winning the second qualifying heat, and when pole-sitter Ben Rowe had trouble coming up to speed, Griffith and several others shot past.

The only thing that could slow Griffith was the race's lone caution on lap 3 when Garrett Hall tagged the backstretch wall. When the field went green again, Griffith put the hammer down. Rowley, MA's Eddie "The Outlaw" MacDonald gave chase as best he could, and could narrow the gap some in traffic, but Griffith restored his margin every time they got clear.

Even as multiple other drivers had strong runs go sour in the unreasonable warm weather, Griffith never wavered. He ultimately put more than half the field a lap down and cruised to an impressive win.

"I love it here," Griffith said after the race. "I tell people all the time about how cool the icebreaker is and how big of a weekend it is. You know we travel everywhere and not everybody understands how big of a weekend it is — and not just for PASS...so to come get another (win) here is pretty cool. It's definitely one to mark off."

MacDonald finished second with Center Conway, NH's Gabe Brown a comfortable third. Rowe recovered from his early troubles and held off Rowland Robinson Jr. for fourth. Reigning PASS North champion D.J. Shaw, Johnny Clark, Corey Casagrande, Mike Scorselli, and Dan Winter rounded out the top-10.

Berlin, CT's Keith Rocco came out on top of a barn-burner to win the Sunoco Modified season opener. Rocco started fourth in the 30-lap main event and took the lead from Oxford, MA's Troy Talman on a lap-9 restart after Christian Turissi's spin.

Welcott, CT's Mike Christopher moved into the runner-up spot following the second caution on lap 13. Rocco and Christopher pulled away from the field nose-to-tail for several laps, but with seven to go, the real bat-

tle began. Christopher dove inside Rocco entering turn 3, the first of what would be six passes in as many laps. Rocco, however, kept putting his Modified out front at the start/finish line where it counted.

As the duo got the two-to-go signal, Christopher finally had the lead by a nose at the line and cleared Rocco entering turn one. Rocco went back underneath him in the third turn, and the two banged nerf bars. Christopher slid up the track, allowing Rocco to get away for another victory in his dominating Thompson Speedway career.

Talman and Todd Owen also got past Christopher thanks to the late contact, finishing second and third in the final rundown. Christopher had to settle for fourth. Danny Cates, Jonathan Puleo, John Lowinski-Loh, Richard Williams, Jason Sundeen, and Paul LaPlante completed the top-10.

Franklin, MA's Bobby Santos III kicked off his icebreaker weekend with a victory in the 25-lap NEMA LITES Midgits feature. Santos started seventh in the Matt and Bob Seymour-owned #1, and after a slow start, began his march to the front. He inherited the second spot on lap 13 when Dan Cugini's Midgits shut down, then caught leader Jim Santa Maria with eight laps to go.

One lap later, Santos dove beneath Santa Maria on the front stretch and cleared him entering turn 1. It was no contest from there as Santos sailed to the victory.

Santa Maria came in second followed by Jake Trainor, Mike Valeri, Richie Coy, Paul Scally, Christopher Vise, Tiana Kibbe, Matt Seavy, and Cugini finished fourth through 10th.

Plymouth, MA Paul Newcomb ended a frenetic two days on a high note by winning the 25-lap Street Stock Open feature. Newcomb started fourth and found an opening early, muscling beneath pole-sitter Ryan Waterman in turn four to take the lead after two laps.

Candia, NH's Jimmy Renfrew Jr. was the only driver who could even come close to hanging with Newcomb on the ensuing green-flag run. Renfrew got a shot on a

restart with eight laps to go after Zachary Mead's spin. But the #80 got loose exiting turn four the following lap. Renfrew eventually slid back to fourth as Newcomb marched to the victory.

Waterman finished second with Kyle Gero third. Joe Kohler, Wayne County, Bobby Segar Jr., Devin McConlogue, Justin Travis, and Nick Hovey also earned top-10 finishes.

Freeport, NY's Gerard Giordano Jr. won a photo finish over Warwick, RI's Ryan Vannose in the 35-lap EXIT Rally Pro Truck Challenge feature. Vannose had pulled away in the middle stages of the event, but Giordano had the better long-run truck and ran him down with seven laps to go. The fourth and final caution came out soon after, setting up a four-lap dash to the finish.

Vannose initially cleared Giordano on the restart. With two laps to go, though, Giordano ducked back inside. Entered turn for the final time, the duo touched and got sideways. After gathering it up, they banged doors again coming to the line. It was Giordano, the former series champion, edging Vannose by 0.015 seconds for the win.

Waterford, CT's Emma Monahan had a strong run for third. Duane Noll, Connor Souza, Joe Arena, Andy Lindeman, Todd Taylor, Joseph Coates, and Randy Coates opened their season with top-10 finishes.

Sterling, CT's Jared Roy continued his domination of the Thompson Mini Stocks with a victory in their 15-lap feature. Roy came from seventh on the starting grid to run down Steven Michalski at the halfway mark. After ducking inside Michalski as the leaders completed lap nine, Roy completed the pass entering turn one a circuit later.

Coming out of turn four the next time around, Michalski broke loose and spun to bring out the race's only caution. Roy had a rear-view mirror fall of Gabe Ferry, CT's Thomas Silva over the final four laps, but held on for the victory. Dave Trudeau, Douglas Curry, and Charles Canfield completed the top-five.

## Public Notices

**Commonwealth of Massachusetts**  
County of Hampden  
The Superior Court  
CIVIL DOCKET  
#2179CV00148

RE: Wilmington Savings Fund Society, FSB, as Owner

Trustee of the Residential Credit Opportunities Trust V.E.

vs Susan I Sheehan et al

ORDER OF NOTICE

BY PUBLICATION

TO: Susan I Sheehan, an

individual residing at 25 Breton

Lane, Holyoke, Massachusetts

01040, Heirs, devisees and

Legal Representatives of the

Estate of James R Joyce,

persons of places unknown,

Jeffrey W Joyce, an individual

residing at 18 Mountaineer

Street, Springfield, Massachusetts

01102; in the County of Hampden; all in

said Commonwealth.

AND TO ALL PERSONS

ENTITLED TO THE BENEFIT

OF THE SERVICE

MEMBERS' CIVIL RELIEF

ACT OF 1940 AS AMENDED

2003 as amended:

Wilmington Savings Fund

Society, FSB, as Owner

Trustee of the Residential Credit Opportunities Trust

V.E., a trust with offices in

c/o American Mortgage

Investment Partners

Management, LLC, 3020 Old

Ranch Parkway, Suite 180,

Seal Beach, California 92740

claiming to be the holder by

assignment of mortgage covering

the real property known as

and numbered 25 Breton

Lane, Holyoke, Massachusetts

01040

given by James R Joyce

and Susan I Sheehan to

Citizenship Services, Inc dated

May 22, 2007

recorded in Hampden

County Registry of Deeds

Book 16704, Page 285,

has filed with said court a

Complaint for authority to fore-

close said mortgage in the

manner following: by entry on

and possession of the prem-

ises therein described and by

exercise of the power of sale

contained in said mortgage.

If you are aware of the

benefits of the Service Members'

Civil Relief Act of 1940 as

amended, and you object to

such foreclosure you or your

attorney should file a written

appearance and answer in

said court at Springfield in said

County on or before 05/13/21

or you may be forever barred

from claiming that such fore-

closure is invalid under said Act.

Witness, Judith Fabricant,

Esquire, Chief Justice of the

Superior Court, at Springfield,

Massachusetts, this 1st day

of April, 2021

Laura S. Gentile,

Clerk of the Courts

04/16/2021

**COMMONWEALTH OF**

**MASSACHUSETTS**

**THE TRIAL COURT**

**HAMPODEN, DIX.**

**Probate & Family Court**

**Docket**

**HD21ED006PP1**

To Jennifer Garbier, Trustee

of the Jennifer J Garbier

Investment Trust, as tenant

in common, of Holyoke,

Massachusetts, in the County

of Hampden, and to all other

persons interested.

A petition has been pre-

sented to said Court by Jodie

Powers, of Holyoke, in the

County of Hampden, repre-

senting that they hold as ten-

ants in common an undivided

part or share of land lying

in Holyoke, in the County of

Hampden, setting forth that

she desires that all of said land

may be sold at private sale

or public auction for not less

than Three Hundred Twenty-

five Thousand (\$325,000.00)

Dollars, and praying that

partition may be made of all

of the land aforesaid according

to law, and to that end that a

commissioner be appointed to

make such partition and be

ordered to make sale and con-

veyance of all, or any part of

said land which the Court finds

cannot be advantageously

divided either at private sale

or public auction, and be ordered

to distribute the net proceeds

thereof after full adjudication

of the equitable claims contained

in said petition and supple-

mental memorandum filed with

the Court.

If you desire to object there-

to you or your attorney should

file a written appearance in

said Court at Springfield before

ten o'clock in the forenoon on

the 7th day of June, 2021, the

return day of this docket.

Witness, BARBARA M.

HYLAND, Esquire, First

Justice of said Court, this 5th

day of April, 2021.

Rosemary A. Saccomani,

Register of Probate

& Family Court

04/16, 04/23, 04/30/2021

**LEGAL NOTICE**

**CITY OF HOLYOKE**

**GAS & ELECTRIC**

**DEPARTMENT**

**102 CABOT OVERHEAD**

**BRIDGE CRANE**

**REPLACEMENT**

Sealed bids for the above

contract will be received by

Holyoke Gas & Electric Dept.

until 2:00 p.m., May 11, 2021

at the Office of the Manager,

99 Suffolk St., Holyoke, MA

01040, at which time bids will

be publicly opened and read.

**Bid Deposit:**

A bid deposit equal to 5%

of the total value of the bid

must accompany all bids and

may be in the form of a cer-

tified, treasurer's, or cashier's

check payable to HG&E from a

responsible bank or trust com-

pany; cash; or a bid bond from

a licensed surety payable to

HG&E.

**Prevailing Wage Rates:**

Prevailing Wage Rates set

by the Mass. Dept. of Labor &

Industries shall be paid to all

people engaged in work under

this contract.

**Site Visit:**

In order to be considered,

Bidders shall participate in a

mandatory site visit to be

held at the 102 Cabot facil-

ity. Proposals received from

Bidders who have not partici-

pated in the site visit will be

automatically be rejected. Due

to COVID-19, site visits will

be scheduled individually. To

schedule a site visit, contact

Sarah LaRocca at (413) 427-

4804 or by email at sarah@

hged.com.

Additional information may

be obtained from:

Ch Wong

Holyoke Gas & Electric Dept.

99 Suffolk St.

Holyoke, MA 01040

(413) 526-9008

cwong@hged.com

The right is hereby reserved

to reject any or all proposals,

or to accept any proposal that

in the opinion of the Manager

may be for the best interest of

the City of Holyoke.

Please mark sealed enve-

lopes "102 Cabot Overhead

Bridge Crane Replacement"

and address them to:

James M. Lavelle, Manager

Holyoke Gas & Electric Dept.

99 Suffolk St.

Holyoke, MA 01040

04/16/2021

**COMMUNITY OUTREACH**

**MEETING**

Notice is hereby given that a

Community Outreach Meeting

for Riverside Cannabis, LLC

a proposed marijuana cultiva-

tor and Blossom Flower, LLC

delivery operator is scheduled

for Thursday, May 6, 2021

at 5:15 p.m. at 1 Cabot St.

Holyoke, MA 01040, the pro-

posed location. There will be

an opportunity for the public to

ask questions. Social distanc-

ing and face masks required.

If you are unable to attend,

please email:

daniels.sporotte42@gmail.com

with questions

04/16/2021

**COMMUNITY OUTREACH**

**MEETING**

A Community Outreach

Meeting for First City

Provisions, Inc., a proposed

vertical marijuana establish-

**Subject:** Fwd: Cannabis Outreach Meeting

**Date:** Monday, April 26, 2021 at 8:03:30 PM Eastern Daylight Time

**From:** Damaris Aponte

**To:** Rebecca Rutenberg

----- Forwarded message -----

From: **Brenna McGee** <[mcgeeb@holyoke.org](mailto:mcgeeb@holyoke.org)>

Date: Mon, Apr 26, 2021 at 8:05 AM

Subject: Re: Cannabis Outreach Meeting

To: Damaris Aponte <[damaris.aponte42@gmail.com](mailto:damaris.aponte42@gmail.com)>

No need for anything else!

Thank you!

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**Brenna Murphy McGee, MMC**

City Clerk/Registrar of Voters/Records Access Officer  
Vice President of the Massachusetts City Clerk's Association

**City of Holyoke, Massachusetts**

536 Dwight Street, Room #2

Holyoke, MA 01040

(T) 413-322-5520

(F) 413-322-5521

*Thank you for your email. Due to a declared public health emergency, City Hall is closed until further notice.*

*During this time, many of our department staff members will not be in office but will be available remotely via email and/or phone for assistance. Essential services will still be provided, including trash & recycling pick up.*

*Please visit [www.holyoke.org](http://www.holyoke.org) for a listing of city departments, contact information and ongoing updates regarding the City's Coronavirus response. Email communications and voicemails are welcome and a staff member will return your message as soon as possible.*

On Fri, Apr 23, 2021 at 11:16 AM Damaris Aponte <[damaris.aponte42@gmail.com](mailto:damaris.aponte42@gmail.com)> wrote:

Hello Brenna,

I am planning an outreach meeting for my cannabis business in Holyoke. I was told to make sure I sent you a copy of the meeting posting. I have posted the community outreach meeting on the Holyoke Sun 4/23/21. I am attaching a copy of the notice. Somehow, I can not get it smaller to just send you the meeting posting instead of the whole page. This notice will be the same letter I will be sending the abutters around the property. Please let me know if there is something else I need to send you.

Thank You,

Damaris Aponte

Riverside Cannabis LLC

Blossom Flower LLC

**CAUTION:** This email is from an EXTERNAL contact. Please do not open attachments, or click on links from unknown or suspicious senders.

April 19<sup>th</sup>,2021

To Whom it May Concern,

Notice is hereby given that a Community Outreach Meeting, for Riverside Cannabis LLC, a proposed marijuana cultivator and Blossom Flower a delivery operator is scheduled for Wednesday May 5<sup>th</sup>, 2021 at 5:15pm. At 1 Cabot Street. Holyoke, MA. 01040, the proposed location. There will be an opportunity for the public to ask questions. Social Distancing and face masks will be required. If you are unable to attend, please email [Damaris.aponte42@gmail.com](mailto:Damaris.aponte42@gmail.com) with questions.

Thank You

Damaris Aponte, CEO

Riverside Cannabis LLC, Blossom Flower LLC

April 19<sup>th</sup>, 2021

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Thank You

Damaris Aponte, CEO

Riverside Cannabis LLC, Blossom Flower LLC

## 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:

Riverside Cannabis LLC

2. Name of applicant's authorized representative:

Damaris Aponte

3. Signature of applicant's authorized representative:

*Damaris Aponte*

4. Name of municipality:

Holyoke

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

Terry Murphy, Acting Mayor



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).*):

MurphyT@Holyoke.org

8. Host community agreement execution date:

March 26, 2021



## **Positive Impact Plan**

### **Regulatory Acknowledgements**

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

No actions taken, or programs instituted by Riverside Cannabis will violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

No donation or program to support any specifically named organizations or the furtherance of their goals have been proposed as this is a direct program from the applicant.

### **Programs:**

Our company's Positive Impact Plan (PIP) comprises four programs which will be implemented by company staff and management:

1. Hiring a work force with a focus on Latino and Latina men and women residents of the City of Holyoke, an Area of Disproportionate Impact
2. Provide Business Educational tours and workshops in our facility to connect the communities we grew up in and people we grew up with to the complexities and successes of the regulated cannabis industry.
3. Community outreach and engagement within the Spanish-speaking community of Holyoke to educate residents about our Latina woman, minority, and Social Equity- owned business.
4. Provide resources to the local community on how to access the community gardens and be able to grow their own fresh fruits and vegetable.

### **Goals:**

1. To hire a minimum of 50% Latino and Latina residents from Areas of Disproportionate Impact, with job opportunities to be advertised on social media platforms such as Facebook and job listing platforms such as Indeed
2. Provide a monthly tour of the facility with a focus on residents from underserved neighborhoods such as the Holyoke Flats and South Holyoke neighboring community.
3. Create education materials in English and Spanish to provide to tour participants in helping them understand the steps to entering the regulated cannabis industry
4. Offer theme-based monthly tours such as Seed to Sale tracking, or Cultivation Assistant 101
5. Quarterly, community outreach by employees in predominantly Spanish-speaking neighborhoods to disseminate educational materials on the Social Equity Program and industry opportunities.
6. To provide basic agriculture tools, seeds, and education on how to "start a community garden" with the goal of agriculture learning.

### **Metrics:**

The following metrics will be evaluated and documented annually upon renewal of the company's provisional license.

1. After one year of operations, 50% of our management and staff Black and Latino or residents from the City of Holyoke?
2. Were all jobs advertised using Facebook, Indeed, or other social media platforms?
3. Have we provided 12 tours (one 1-hour tour per month) to the public, with a focus on word-of-mouth outreach in our community to encourage underserved residents to attend?
4. Have we written, printed and disseminated educational materials about the steps to entering the cannabis industry at our tours?
5. Have we provided at least 1 theme-based tour of our facility to 5 people or more, quarterly, with evidence for flyers left at residence, outreach and word of mouth advertising in the Holyoke Flats?
6. Have we gathered staff once a quarter to walk the predominantly Spanish-speaking neighborhoods, with an intent to disseminate education materials and speak directly to residents about the Social Equity program and our woman, minority, and Social Equity owned business?
7. Have we provided the resources for residents to engage in the city's community gardens?



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

Minimum Fee: \$500.00

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

**Certificate of Organization**

(General Laws, Chapter )

Identification Number: 001496812

1. The exact name of the limited liability company is: RIVERSIDE CANNABIS LLC

**2a. Location of its principal office:**

No. and Street: 1 CABOT STREET  
 City or Town: HOLYOKE State: MA Zip: 01040 Country: USA

**2b. Street address of the office in the Commonwealth at which the records will be maintained:**

No. and Street: 1 CABOT STREET  
 City or Town: HOLYOKE State: MA Zip: 01040 Country: USA

**3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:**

THIS LLC IS BEING FORMED WITH THE SOLE PURPOSE OF APPLYING FOR A LICENSE WITH CANNABIS CONTROL COMMISSION

**4. The latest date of dissolution, if specified:**

**5. Name and address of the Resident Agent:**

Name: DAMARIS APONTE  
 No. and Street: 16 MAYER DRIVE  
 City or Town: HOLYOKE State: MA Zip: 01040 Country: USA

I, DAMARIS APONTE resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

**6. The name and business address of each manager, if any:**

Title	Individual Name	Address (no PO Box)
	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
MANAGER	DAMARIS APONTE	1 CABOT STREET HOLYOKE, MA 01040 USA

**7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.**

Title	Individual Name	Address (no PO Box)
	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
SOC SIGNATORY	DAMARIS APONTE	1 CABOT STREET

**8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:**

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	DAMARIS APONTE	1 CABOT STREET HOLYOKE, MA 01040 USA

**9. Additional matters:**

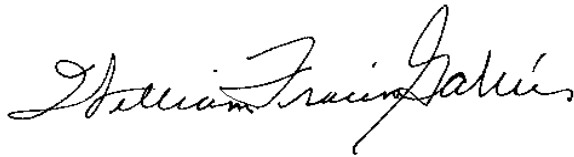
**SIGNED UNDER THE PENALTIES OF PERJURY, this 25 Day of March, 2021,**  
**DAMARIS APONTE**

*(The certificate must be signed by the person forming the LLC.)*

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:

March 25, 2021 12:31 PM

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*



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

mass.gov/dor

Letter ID: L1206510400  
Notice Date: April 12, 2021  
Case ID: 0-001-127-790



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



RIVERSIDE CANNABIS LLC  
1 CABOT ST  
HOLYOKE MA 01040-6097

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

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

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

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

### *What if I have questions?*

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

### *Visit us online!*

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau

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

Signed under the pains and penalties of perjury, I, Damaris Aponte, an authorized representative of Riverside Cannabis LLC, certify that the company 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.

*Damaris Aponte*

Name: Damaris Aponte

Entity: Riverside Cannabis LLC

4/21/2021

Date

**OPERATING AGREEMENT  
OF  
RIVERSIDE CANNABIS LLC**

This Operating Agreement (the “**Agreement**”) of Riverside Cannabis LLC (the “**Company**”), executed on this April 21, 2021 and effective as of March 25, 2021 (the “**Effective Date**”), is entered into by and between the Company and Damaris Aponte, as the single member of the Company (the “**Member**”).

**RECITALS**

WHEREAS, the Company was formed as a limited liability company on March 25, 2021 by the filing of a certificate of organization (“**Certificate of Organization**”) with the Secretary of the Commonwealth of Massachusetts pursuant to and in accordance with the Massachusetts Limited Liability Act, as amended from time to time (the “**MLLCA**”); and

WHEREAS, the Member agrees that the membership in and management of the Company shall be governed by the terms set forth in this Agreement.

NOW, THEREFORE, the Member and the Company agree as follows:

Section 1      **Name.** The name of the Company is Riverside Cannabis LLC.

Section 2      **Purpose.** The general character of the Company is to purchase and own real estate, together with any and all other lawful acts or activities for which limited liability companies may be formed under the MLLCA and to engage in any and all necessary or incidental activities.

Section 3      **Powers.** The Company shall have all the powers necessary or convenient to carry out the purposes for which it is organized, including the powers granted by the MLLCA.

Section 4      **Principal Office; Registered Agent.**

(a)      Principal Office. The location of the principal office of the Company shall be 1 Cabot Street, Holyoke, MA 01040, or such other location as the Member may designate.

(b)      Registered Agent. The registered agent of the Company for service of process in the Commonwealth of Massachusetts and the registered office of the Company in the Commonwealth of Massachusetts shall be that person and location reflected in the Certificate of Organization. In the event the registered agent ceases to act as such for any reason or the registered office shall change, the Manager shall promptly designate a replacement registered agent or file a notice of change of address, as the case may be, in the manner provided by law.

Section 5      **Members.**



(a) Initial Member. The Member owns one hundred percent (100%) of the membership interests of the Company. The name and the business, residence, or mailing address of the Member are as follows:

Damaris Aponte  
1 Cabot Street  
Holyoke, MA 01040

(b) Additional Members. One or more additional members may be admitted to the Company with the written consent of the Member. Prior to the admission of any such additional members to the Company, the Member shall amend this Agreement or adopt a new operating agreement to make such changes as the Member shall determine to reflect the fact that the Company shall have such additional members. Each additional member shall execute and deliver a supplement or counterpart to this Agreement, as necessary.

(c) Membership Interests; Certificates. The Company will not issue any certificates to evidence ownership of the membership interests.

## Section 6      **Management.**

(a) Management of the Company. The operations and affairs of the Company shall be managed by a manager (the “**Manager**”). Any action taken by the Manager shall constitute the act of and serve to bind the Company. Persons dealing with the Company are entitled to rely conclusively on the power and authority of the Manager as set forth in this Agreement. The Manager shall have all rights and powers of managers under the MLLCA, and shall have such authority, rights and powers in the management of the Company to do any and all other acts and things necessary, proper, convenient or advisable to effectuate the purposes of this Agreement.

(b) Initial Manager. The initial Manager shall be Damaris Aponte.

(c) Election of Officers; Delegation of Authority. The Manager may, from time to time, designate one (1) or more officers with such titles as may be designated by the Manager to act in the name of the Company with such authority as may be delegated to such officers by the Manager (each such designated person, an “**Officer**”). Any such Officer shall act pursuant to such delegated authority until such Officer is removed by the Manager. Any action taken by an Officer designated by the Manager pursuant to authority delegated to such Officer shall constitute the act of and serve to bind the Company. Persons dealing with the Company are entitled to rely conclusively on the power and authority of any Officer set forth in this Agreement and any instrument designating such Officer and the authority delegated to him or her.

## Section 7      **Liability of Member, Managers, and Officers; Indemnification.**

(a) Liability of Member, Managers, and Officers. Except as otherwise required in the MLLCA, the debts, obligations and liabilities of the Company, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the Company, and the

Member, the Managers, and the Officers shall not be personally liable for any such debt, obligation or liability of the Company solely by reason of being or acting as a member, manager, or officer of the Company.

(b) **Indemnification.** To the fullest extent permitted under the MLLCA, the Member, Managers, and Officers (irrespective of the capacity in which it acts) shall be hereby indemnified by the Company and entitled to advancement of expenses from the Company for and against any loss, damage, claim or expense (including attorneys' fees) whatsoever incurred by the Member, Manager, and Officers relating to or arising out of any act or omission or alleged acts or omissions (whether or not constituting negligence or gross negligence) performed or omitted by the Member, Manager, or Officers on behalf of the Company; provided, however, that any indemnity under this (b) shall be provided out of and to the extent of Company assets only, and neither the Member, Manager, or Officers nor any other person shall have any personal liability on account thereof.

Section 8 **Term.** The term of the Company shall be perpetual unless the Company is dissolved and terminated in accordance with Section 12.

Section 9 **Capital Contributions.** The Member may contribute to the Company such cash, property, or services as determined by the Member from time to time, or loan funds to the Company, as the Member may determine in its sole and absolute discretion; provided, that absent such determination, Member is under no obligation whatsoever, either express or implied, to make any such contribution or loan to the Company.

Section 10 **Tax Status; Income and Deductions.**

(a) **Tax Status.** As long as the Company has only one (1) member, it is the intention of the Company and the Member that the Company be treated as a disregarded entity for federal and all relevant state tax purposes and neither the Company, the Manager, nor the Member shall take any action or make any election which is inconsistent with such tax treatment. All provisions of this Agreement are to be construed to preserve the Company's tax status as a disregarded entity.

(b) **Income and Deductions.** All items of income, gain, loss, deduction, and credit of the Company (including, without limitation, items not subject to federal or state income tax) shall be treated for federal and all relevant state income tax purposes as items of income, gain, loss, deduction, and credit of the Member.

Section 11 **Distributions.** Distributions shall be made to the Member at the times and in the amounts determined by the Manager, subject to the obligations of the Company and applicable law. Notwithstanding the foregoing, the Manager shall make quarterly distributions to the Member in an amount equal to the Members quarterly estimated taxes due in connection with the Member's membership interest in the Company, which shall be estimated in good faith by the Manager.

Section 12 **Dissolution; Liquidation.**

(a) The Company shall dissolve, and its affairs shall be wound up upon the first to occur of the following: (i) the written consent of the Member or (ii) any other event or circumstance giving rise to the dissolution of the Company under Section 43 of the MLLCA, unless the Company's existence is continued pursuant to the MLLCA.

(b) Upon dissolution of the Company, the Company shall immediately commence to wind up its affairs and the Manager shall promptly liquidate the business of the Company. During the period of the winding up of the affairs of the Company, the rights and obligations of the Member and the Manager under this Agreement shall continue.

(c) In the event of dissolution, the Company shall conduct only such activities as are necessary to wind up its affairs (including the sale of the assets of the Company in an orderly manner, which sales, to the extent permitted by and subject to applicable laws, shall first be offered to the Members), and the assets of the Company or the proceeds therefrom shall be applied as follows: (i) first, to creditors, to the extent otherwise permitted by law, in satisfaction of liabilities of the Company (whether by payment or the making of reasonable provision for payment thereof); and (ii) second, to the Member.

(d) Upon the completion of the winding up of the Company, the Member shall file the Certificate of Cancellation in accordance with the MLLCA.

#### Section 13 **Miscellaneous.**

(a) Amendments. Amendments to this Agreement may be made only with the written consent of the Member.

(b) Governing Law. This Agreement and the rights and obligations of the parties hereunder shall be governed by and interpreted, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts, without giving effect to principles of conflicts of law.

(c) Severability. In the event that any provision of this Agreement shall be declared to be invalid, illegal or unenforceable, such provision shall survive to the extent it is not so declared, and the validity, legality and enforceability of the other provisions hereof shall not in any way be affected or impaired thereby, unless such action would substantially impair the benefits to any party of the remaining provisions of this Agreement.

[Signature Page to Follow]

IN WITNESS WHEREOF, the undersigned have executed this Agreement to be effective as of the date first written above.

**The Company:**

Riverside Cannabis LLC

*Damaris Aponte*

---

By: Damaris Aponte

Its: Manager

**The Member:**

Damaris Aponte

*Damaris Aponte*

---



William Francis Galvin  
Secretary of the  
Commonwealth

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

April 20, 2021

TO WHOM IT MAY CONCERN:

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

**RIVERSIDE CANNABIS LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **March 25, 2021**.

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

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

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

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



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

Processed By:CFM

### **PLAN FOR OBTAINING LIABILITY INSURANCE**

Riverside Cannabis LLC (“Riverside”) 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 and \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Riverside will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, Riverside 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. Riverside will keep reports documenting compliance with 935 CMR 500.105(10): *Liability Insurance Coverage or Maintenance of Escrow* in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

**BUSINESS PLAN**

# **Riverside LLC**

**Holyoke, MA**

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2. Project Overview
  - 2.1. Introduction
  - 2.2. Company Ownership
  - 2.3. Company Location and Facilities
  - 2.4. Product testing
  - 2.5. Legal Counsel
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  - 3.1. Product Description
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  - 7.1. Personnel Plan
8. Financials



# Disclaimer

This business plan summarizes certain information about Riverside LLC, a Massachusetts-based, licensed cannabis cultivation, processing, and manufacturing company. Except where the context requires otherwise, “Riverside”, “Company”, “We”, and “Our”, refer to the company Riverside LLC.

This business plan is confidential and proprietary. It has been furnished by Riverside LLC to prospective investors for the sole purpose of evaluation of the transaction. In accepting and studying this document, the reader agrees that they will not release this document, or make a reproduction of, or use this business plan for any other purpose without the prior written permission of Riverside,. Prospective investors should not assume that this business plan is complete and should conduct their own analysis and investigation of Riverside and consult with their own financial, legal, tax and other business advisors before investing in Riverside. Prospective investors agree that they are responsible for conducting their own due diligence investigation to verify to their satisfaction any information, opinions, or estimates in this document. Prospective investors in Riverside and any other persons who receive this business plan agree that they will hold its contents, and all related documents in confidence and that they will not utilize such information to the detriment of Riverside. Distribution or reproduction of this business plan or related materials, whole or in part, is prohibited. Riverside makes no representations or warranties as to the accuracy or completeness of the information presented herein. Nothing contained herein is, or should be relied on, as a promise or representation as to the future performance of the company.

## Forward-looking statements

Certain statements in this business plan constitute forward-looking statements, which may be identified by words such as, will, expect, plan, intend,. Anticipate, and other words indicating that the statements are forward-looking. Such forward-looking statements are expectations only and are subject to known and unknown risks, uncertainties, and other important factors that could cause the actual results, performance or achievements of the company, or industry results, to differ materially from any future results, performance or achievements implied by such forward-looking statements. All of the financial information in this business plan is unaudited.

# **1. Executive Summary**

## **Company Summary**

As cannabis emerges from the shadow of prohibition, its obvious popularity and ubiquity shows it to be a widely popular herb second only to alcohol and nicotine in North America. Our facility plans to grow choice sativa-dominant, indica-dominant, and hybrid cultivars to meet market demand. These selected genetics are the result of over four generations of consistent growing in the New England climate and offer a sought after prized product. Our master growers have chosen the superior current and future stars of the cannabis constellation.

We further benefit from our range of mature, and thoroughly market-tested products developed through many years of large-scale production, and free-market sales. While for many users the world of cannabis focuses largely on eating and smoking, we intend to achieve a significant market share by focusing our efforts on pure flower (as popular as ever following the recent “vape” scare), high-grade extracts, kief, rosin, edibles, and the ever popular topicals. This “shotgun” approach will allow us to capture a broad spectrum of customer groups and demographics, identify trends, and rapidly pivot to meet market needs.

## **Mission**

Riverside will develop a state-of-the-art, year-round, indoor cultivation, extraction and production facility to create a range of expertly crafted, high-quality cannabis products serving all permissible legal cannabis markets.

### **Key Objectives**

- Secure Capex and Opex investment
- Secure Property
- Secure State and City Licensing
- Fit-out and equip cultivation, extraction, and manufacturing facilities
- Commence operations
- Effective management of revenues and working capital
- Reinvestment to maintain competitive edge and market share

## **Products and Services**

Riverside will grow and transform a selection of high quality and popular cannabis strains using green production practices and proven genetics that strike a balance between the high yield pricing and outstanding quality that end-users value. Our facility will yield around 3,250lbs of pure flower (or bud), and a further 3,583 lbs of trim per year.

Trim, which generally includes a quantity of smaller waste, or popcorn buds, is processed to create cannabis extract, our bulk extract product, and the THC component of our manufactured products. All

products will be sold to licensed distributors and retailers with an estimated 25% of output going to distributors, and the remaining 75% going to licensed retail outlets.

## **Product descriptions**

**Flower** - While careful strain selection and obsessive cultivation practices will create the ideal plant at the point of harvest, the curing process is a critical determinant of the final quality of the cannabis product. While all cultivators and manufacturers understand the importance of curing it is often the first victim in the battle for speed and convenience. While some cultivators do take the time to cure their product sympathetically, their efforts are often thwarted by woefully inadequate dispensing methods that see the product deteriorating rapidly pre-sale. We address this problem by hand-selecting flower buds, curing them correctly, and creating standardized weight portions that allow retailers to offer them directly to consumers in sealed packages that preserve freshness, quality, and flavor.

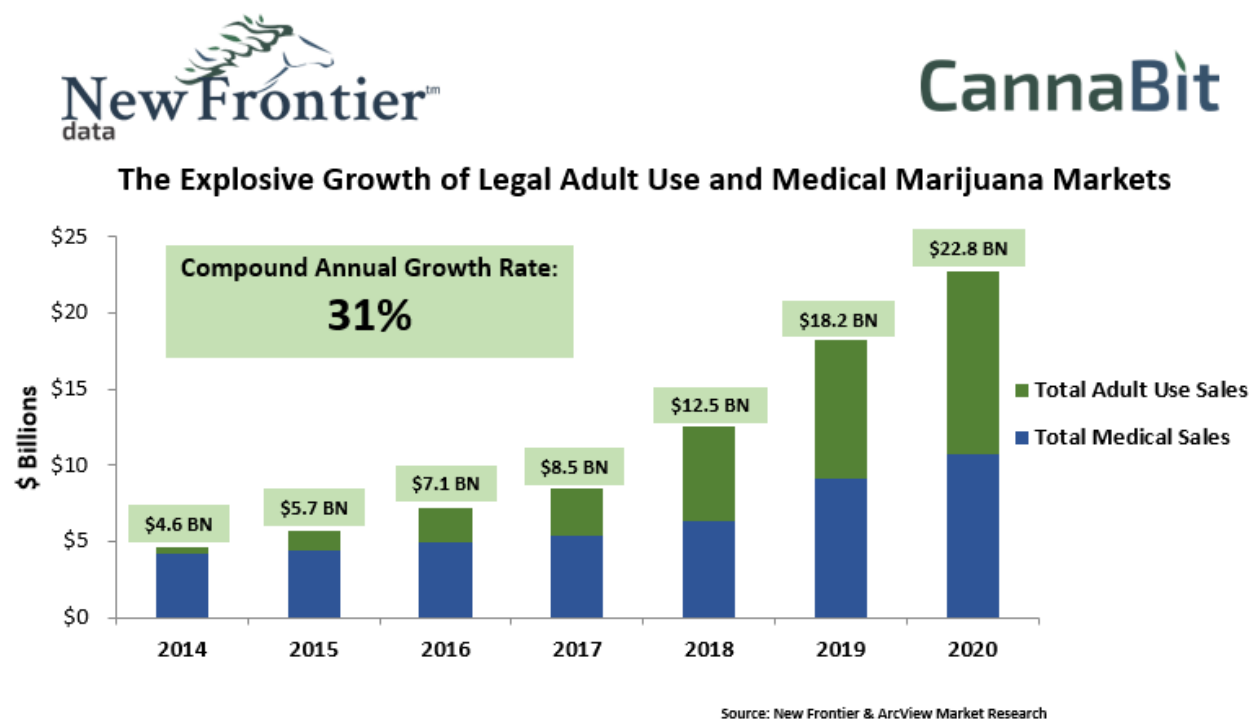
**Cannabis Oil Extract** - Cannabis oil extract is a derivative of cultivation waste that lies at the heart of our product range. With the exception of cannabis flower, the THC component of all other products is derived from cannabis extract in its various guises. Indeed, the vast majority of cannabis products contain some form of cannabis extract, a market commodity in its own right. We can choose to use this derivative extract in the products we produce, or sell it to others for use in products that they produce. We can even convert eventual lower quality flower into cannabis extract.

**Topicals** - These are external applications of cannabis that are used by some to treat body pain, skin or health conditions. Infused with THC, and other cannabinoid extracts, topicals include lotions, creams, balms, and oils. As they are generally non-psychoactive, topicals are often chosen by individuals who need the therapeutic benefits of cannabis without the cerebral euphoria associated with other delivery methods.

**THC-infused Edibles** - Cannabis edibles are preferred by some consumers because ingesting cannabinoids through the GI tract provides a different and often more therapeutic effect than inhaling. Future plans include offering a range of attractive, appetizing, and appealing, adult-use edible products. Our product range will only be limited by the imaginations of our in-house development team.

## Market Opportunities

Over 60% of the U.S. population now lives in states that have legalized cannabis use in some form or another, underscoring the rising acceptance of cannabis nationwide and highlighting the industry's immense potential for future growth. According to the report *The Road Map to a \$57 Billion Worldwide Market*<sup>1</sup>, the overall cannabis market for legal adult-use and medical sales in North America to reach 24.5 billion by 2021 with the Compound Annual Growth Rate at almost 28% (31% according to the Women's Cannabis Chamber of Commerce.)



The North America legal cannabis market amounted to \$12 billion in 2018, growing by 30 percent on the year. The largest market was the United States, which totaled \$10.4 billion, followed by Canada with \$1.6 billion. (No data is available for Mexico.) Currently, 33 U.S. states and the District of Columbia have legalized cannabis use in some form (medical or adult-use). The majority of these states have allowed sales for medical use, and 11 states, including Massachusetts, have legalized recreational or adult-use. Since 60% of the U.S. population resides in states that have legalized the use of cannabis in some form, this indicates immense possibilities for the future. According to New Frontier data, combined medical and adult-use sales exceeded \$8 billion in 2017, \$12.5 billion in 2018, with adult-use sales alone estimated to have exceeded \$12.5 billion annually by 2020, making cannabis the fastest growing industry in the U.S.

<sup>1</sup> <https://arcviewgroup.com/research/reports/>

## Startup Summary

Riverside is a Massachusetts-registered Limited Liability Corporation, established to achieve the legalized cultivation, processing, and manufacture of high-quality cannabis plants and products. The main facility will consist of a 18,000 sq ft production facility divided into propagation, vegetation and flowering zones, and extraction room, manufacturing, packaging, and administration spaces, and offering a total canopy of 10,000 sq ft.

This state-of-the-art facility will include advanced, environmentally-focused, and cost-effective technologies using natural light and supplemental lighting for the perfect balance of economy and efficiency. Our automated production system will allow remote, real-time access to all control and diagnostic systems in the facility. The production output will provide licensed retailers and wholesale distributors with high quality flower, cannabis extract-based products, and bulk extract.

## Financial Summary

Capital requirements: The capital requirements for the successful execution of phase one of this business plan are \$5,000,000, of which \$1,343,080 represents turn-key investments, \$200,000 represents contingency funding for the first year of operations, and \$3,456,920 represents working capital.

Construction and Fit-out	565,925
Cultivation Equipment	699,540
Extraction Equipment	27,420
Manufacturing Equipment	27,420
Permits, Licenses, and Applications	22,775
Contingency Operational Funds	200,000
Working Capital	3,456,920
<b>TOTAL</b>	<b>\$5,000,000</b>

## **Direct and Indirect Community Benefits**

Riverside hopes to bring a number of benefits to the Holyoke community. The City of Holyoke will receive a state-mandated community impact fee of up to 3% of gross revenues. This fee serves to compensate the city for additional costs incurred as a result of Riverside's operations. We will create up to 20 well-paid, full-time, job opportunities, to which Holyoke residents will, in accordance with our Host Community Agreement, be given priority.

In addition, Riverside, as a condition of our licenses, will execute a Positive Impact Plan, designed to create pathways to participation in the licensed cannabis industry for those adversely affected by the War on Drugs through personal or parental incarceration, or through residence in the state-defined Area of Disproportionate Impact; and a Diversity Plan, a staffing strategy to ensure mindful hiring practices with regards minorities, veterans, women, and the LGBTQ+ community.

# Market Overview

## Global Cannabis Market

The global legal cannabis market amounted to **\$19.5 billion** in 2017, growing by 37 percent on the year, according to the report *The Road Map to a \$57 Billion Worldwide Market*<sup>2</sup>. Spending on legal cannabis worldwide is expected to hit **\$57 billion** by 2027, with the cannabis market in the United States and Canada estimated to answer for about **\$46.5 billion** and the remaining **\$10.5 billion** going to other markets. The largest growth rate is predicted within the rest-of-world markets with the **\$52 million** spent in 2017 rising to a projected **\$2.5 billion** in 2027. The market as a whole is anticipated to be divided between adult-use and medical, with the recreational cannabis market comprising 67% and the medical market comprising 33% of the total market.

According to a report provided by *Energias Market Research*<sup>3</sup>, the global medical cannabis market is projected to increase in value from **\$8.28 billion** in 2017 to **\$28.07 billion** in 2024, with an estimated Compound Annual Growth Rate of 19% from 2018 to 2024.

## Key Global Trends:

- The initial decision by many U.S. states and Canada to create medical-only cannabis regulations prompted many other countries to act similarly while legalization of adult recreational use in California and Canada triggered a second wave of legalizing laws internationally to increase access to medical cannabis.
- South America countries have the most liberal medical cannabis programs. Led by Brazil, Argentina, Peru and Uruguay, the South American medical cannabis market may grow from \$125 million in 2018 to \$776 million in 2027.
- Germany is ready to become a leader of the European cannabis market, and Italy is expected to be second with \$1.2 billion in sales by 2027. Some form of medical cannabis is now legal in 22 countries in Europe.
- Australia's legal cannabis market is forecast to grow from \$52 million in 2018 to \$200 million in 2027, representing the 5th largest cannabis market in the world.
- Israel has a small population and a long history of legal medical cannabis use. It continues to be a leader over the years in the development of cannabis pharmaceuticals.

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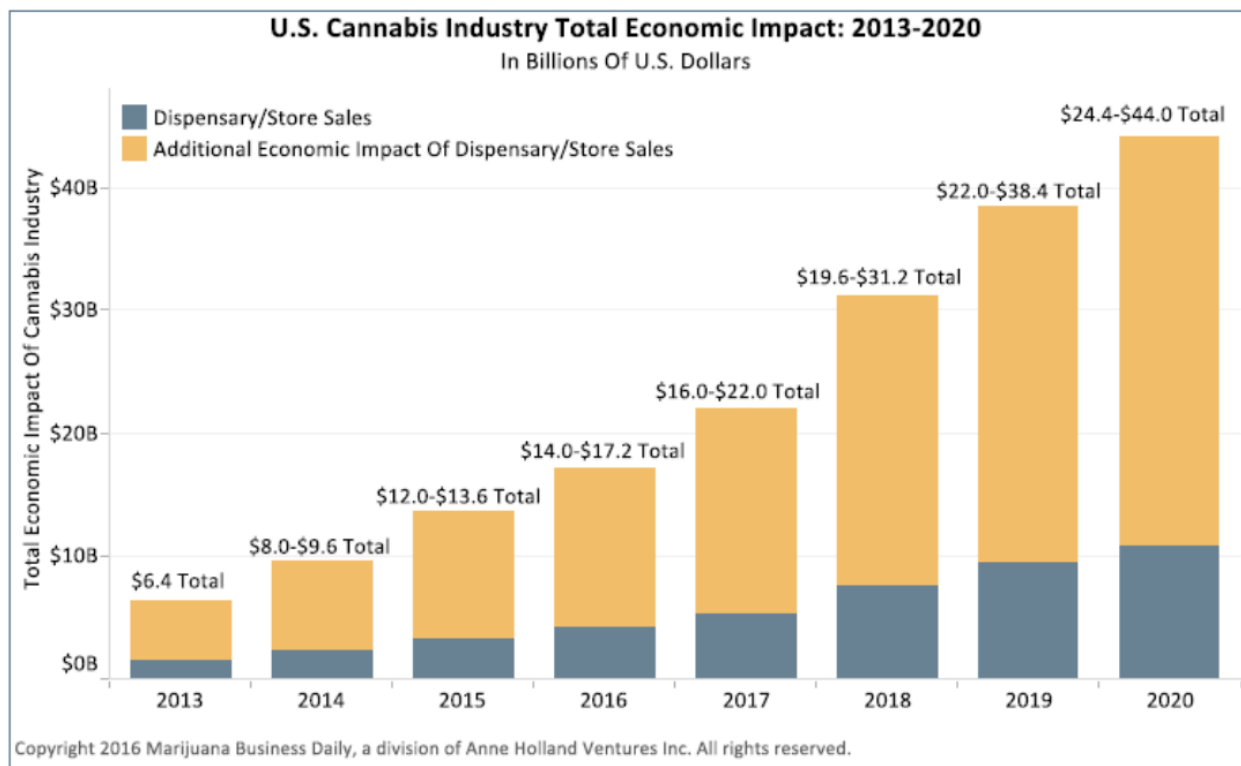
<sup>2</sup> <https://arcviewgroup.com/research/reports/>

<sup>3</sup> <https://energiasmarketresearch.com/global-medical-marijuana-market-outlook/>

## North America Cannabis Market

The North America legal cannabis market amounted to **\$12 billion** in 2018, growing by 30 percent on the year. The largest market was the United States, which totaled **\$10.4 billion**, followed by Canada with **\$1.6 billion**. While little data is available, Mexico saw the possession of small amounts of cannabis decriminalized in 2009, and medical use for low-THC cannabis legalized in 2017. The law prohibiting its use was declared unconstitutional by the Supreme Court of Mexico on October 31, 2018 making this law generally unenforceable.

A report from cannabis industry analysts *Arcview Market Research*, in partnership with *BDS Analytics*<sup>4</sup>, forecast that the entire legal cannabis market in North America will reach **\$24.5 billion** in sales - a 28% annual growth rate by 2021 - as more countries and states legalize cannabis for recreational use and existing markets mature, and will grow to **\$47.3 billion** by 2027.



<sup>4</sup> <https://bdsanalytics.com>

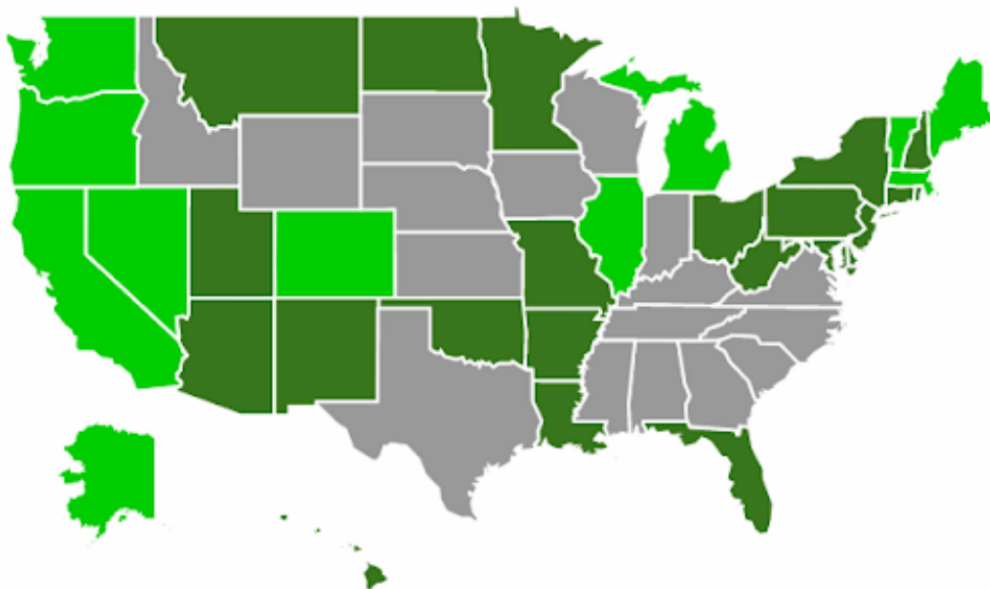


## U.S. Cannabis Market

In 2018, 62% of Americans reported supporting cannabis legalization, double the 2000 figure of 31%. Although the use of cannabis is illegal under federal law and the Controlled Substances Act of 1970 which classes cannabis as a schedule I drug, more than 60% of U.S. states have legalized it in some form. Most states legalized it only for medical purposes, but eleven states - Alaska, California, Colorado, Illinois, Maine, Massachusetts, Michigan, Nevada, Oregon, Vermont, and Washington - have gone further, legalizing cannabis for recreational use. As a result, 33 states, the District of Columbia, Puerto Rico, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands have effective medical cannabis laws, and 11 states and the District of Columbia now allow cannabis for adult use.

According to *Statista*<sup>5</sup> there are about 10,000 active cannabis business licenses for cannabis businesses in the U.S., including cultivation, extraction, manufacturing, retail, distribution, and testing licenses. The industry employed 121,000 persons in 2017 and 259,000 persons in 2018. If the cannabis market sustains its current growth trend, the number of people engaged in that industry could reach about 500,000 by 2022 according to *New Frontier Data*.

### States where cannabis has been legalized.



<sup>5</sup> <https://www.statista.com/statistics/596641/us-cannabis-number/>

### **U.S. Wholesale Pricing Benchmarks**

The U.S. Spot fell by 21.8% from the opening to the closing week of 2018. Additionally, for Q4, the national composite rate averaged \$1,094 per pound, off by 32.8% compared to the quarterly average price of \$1,417 per pound, documented in the same period in 2017. Yet Q4 2018's mean going rate is off by only 2.2% from Q3's quarterly average price of \$1,119 per pound. Rising rates in California, Colorado, and Oregon in the wake of the fall harvest period worked to mitigate the quarter-over-quarter downturn. The current Massachusetts wholesale spot price is estimated to be \$2,000.

- 2016 U.S. Spot Index average = \$1,789
- 2017 U.S. Spot Index average = \$1,562
- 2018 U.S. Spot Index average = \$1,194
- 2019 U.S. Spot Index average = \$1,411
- 2020 U.S. Spot Index average = \$1.422 (YTD)

### **Massachusetts Cannabis Market**

With the passing of new legislation, legalized cannabis is the fastest growing U.S. Industry. According to *ArcView Market Research*, the U.S. national legal cannabis market value is now assessed at \$6.7 billion, comprising all states that have active and open sales of cannabis to people legally allowed to possess it under state law. The national market is projected to grow from current levels to \$24.1 billion by 2025 according to *New Frontier Data's* 2017 Executive Summary. On November 8, 2016, Massachusetts voters approved the adult recreational use of cannabis. In 2017, an eight-person Cannabis Control Commission (CCC) was appointed by the Massachusetts state government to write the draft regulations for the law. The final regulations were released in April 2018, outlining the requirements for cultivation, production, security, transport, and retail sale of cannabis to consumers over 21 years of age. The opening and legalization of the Massachusetts adult-use cannabis market have seen a great many players of all sizes looking to claim their share of the market. The initial phases of this liberalization will likely witness much innovation, novelty, and social exploration. Data shows that many retailers have applied for licenses and that successful applicants will naturally need products to sell. The initial "novelty-factor" of legalized cannabis will (if legalization in other states is anything to go by) likely lead to an initial surge in sales leading to shortages of supply, followed by a modest downward trend towards stabilization in sales on the market as a whole.

# **Sales & Marketing Strategy**

## **Marketing Plan**

As cannabis is illegal under federal law, state governments and online advertising platforms are placing strict rules on how companies can market their products. Google, Facebook, and Twitter all have advertising policies that restrict the promotion of the sale of cannabis. Google's policy prohibits ads that promote "substances that alter a person's mental state for the purpose of recreation." And Twitter bans "illegal drugs" as well as substances that cause "legal highs." Instagram and Facebook have decided to go a step further by removing pages of cannabis related businesses. Similarly, local mainstream media and advertising channels are reluctant to expose themselves to the divisiveness that cannabis continues to excite.

The most effective strategies for legal cannabis companies are direct marketing at industry conferences and other events, and building communities around cannabis-related concerns such as health and wellness. Our marketing and sales strategy will be based on generating long-term, personalized relationships with manufacturers and adult-use stores.

Our marketing and advertising campaign activities will include:

- Meeting with distributors and retailers
- Email Marketing
- Advertisements and articles in thematic magazines
- Business events and conferences
- Business and industry associations
- Brand development Brochures and collateral
- Website development with search engine optimization
- Cannabis business directories and platforms such as;
  - WeedMaps offering 7,750 listings throughout the U.S., Canada, and Europe. WeedMaps has 7.96 million visits each month.
  - Leafly is a cannabis information resource that connects consumers with their desired strains and products. Leafly has 10 million monthly visitors.

- Both Cannasaver and Cannabis Coupon Codes are websites that offer cannabis and cannabis-related coupons. These sites enjoy visitor numbers of 120,000 per month, and an estimated 80,000 per month, respectively.

## **Competitive Landscape**

Companies in the cannabis industry typically compete on product type, quality, volume, and reliability. As a result of the maturity of a once illicit market, price competition, while an important factor, has widely recognized norms and expectations. While these historical conditions may, superficially, appear to make competing on the price a somewhat lower expectation, the volume of potential cultivators makes price point pressures a genuine possibility. We will counter this with a robust pricing strategy that ensures the Cost of Goods Sold is carefully balanced against a potentially variable sales price providing revenue stability and continued profitability. We will produce a variety of high-quality strains and unique product profiles in a quantity and frequency that will allow us to carve ourselves a substantial niche in the promising pure flower and THC edible markets. While the major players in the market may be expected to exert some form of price pressure, their growing and production techniques are geared towards a mass-market product that many consumers feel does not retain sufficient integrity for sophisticated cannabis use and can strip essential flavors and benefits from the product. We will counter the pressure from the major players with the outstanding quality of our flower and THC-infused products.

## **Direct Competition**

Our direct competition will, unsurprisingly, come from cultivators, manufacturers that grow, produce and sell similar products with the same (or higher) quality and volume. The exact nature of such competition is difficult to quantify as the state of Massachusetts is in the early stages of issuing adult-use cannabis licenses. At the same time, many towns in Massachusetts have implemented outright bans on the cultivation and sale of cannabis, or have introduced moratoria to keep the cannabis industry at arms length and allow themselves greater time to adopt appropriate bylaws. These actions serve to limit competition and reduce the number of available locations.

## **Competitive advantages:**

- A well-rounded executive team with extensive business experience
- Sufficient volume to become a market force
- Premium product quality
- Competitive pricing
- Year-round growth
- Timing of entry into the marketplace

## Target Market

The broad thrust of the Massachusetts cannabis market will aim to serve men in the 21-40 years age group primarily. While this is a market our retail and wholesale customers will undoubtedly intend to exploit, anecdotal evidence suggests that the real growth market lies elsewhere. We aim to direct our products, marketing, and branding at three additional groups that we see as the emerging market;

- **Consumers over 40 years old** – Those over 40 years old are statistically the highest earners in the household. They are more likely to have mature, sophisticated tastes, more aches and pains, a greater appreciation for high-quality products, and a willingness to pay for this higher quality.
- **Adult women consumers** – With a tendency for the industry to aim marketing at men in the 21-40 years age group, women struggle to find products with which they can readily identify. Our products will be presented, packaged and branded in a manner that women will find attractive, and that will demonstrate that cannabis is a product for them rather than a male-dominated culture to which they must adapt.

## Target Sales Market

Wholesale sales of cannabis are strictly limited to licensed retail outlets, manufacturers, distributors, and, in the future, cannabis cafes and smoke clubs. The location, presence, and licensing status of these establishments will be publicly available through a single online source. Regulations currently preclude opportunities for online purchases as the transportation of cannabis products is strictly regulated. Similarly, home delivery licenses, once permitted, will be heavily regulated.

As a cultivation and manufacturing facility, our target sales market must include all legitimate sales channels with our focus on the market sectors that offer the greatest opportunities for returns. We intend to sell our products to all of the above groups as appropriate.

Financial Snapshot:

Annual Revenues (E)	Year One	Year Two	Year Three	Year Four	Year Five
Wholesale Flower Sales	-	6,767,770	9,691,514	11,232,000	11,232,000
Wholesale Product Sales	-	4,662,618	6,676,916	7,738,225	7,738,225
<b>TOTAL</b>	<b>\$-</b>	<b>\$11,430,388</b>	<b>\$16,368,430</b>	<b>\$18,970,225</b>	<b>\$18,368,225</b>

# Operating Plan

## **Cultivation Facility**

Riverside LLC will create an indoor cultivation facility with a 10,000 sq/ft of canopy in a multi-level configuration. This space will be subdivided to create zones for cloning, propagation, vegetative and flower growth. Our cultivation and processing areas will include:

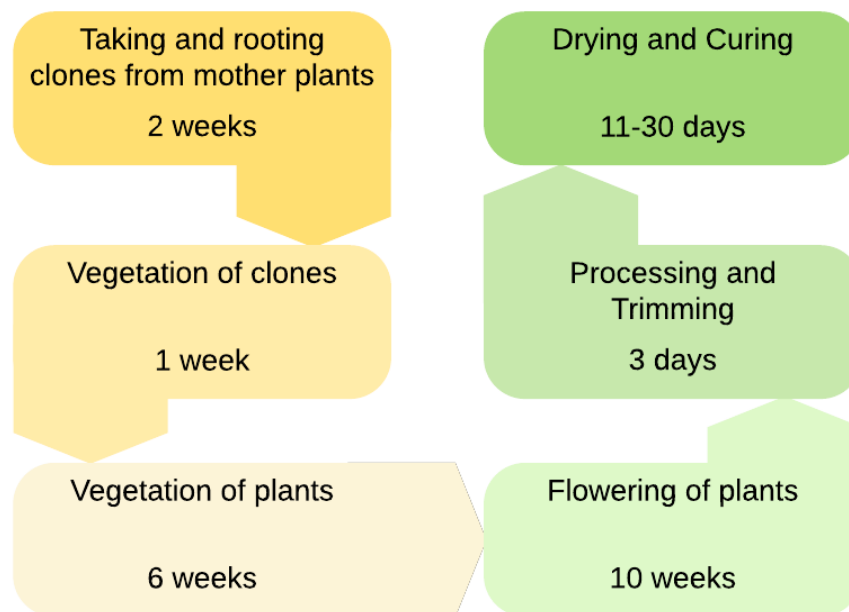
- Mother and Cloning room - This is the space in which “mother” plants are cared for, and from which “cuttings” are derived to create rooted clones.
- Vegetative growth room - It is here that each plant will be cultivated, trimmed, and nurtured to develop the optimal size prior to triggering the flowering cycle.
- Flowering room - The plants are placed in a dedicated flowering room that operates in a light cycle designed to trigger and promote the growth of flowers, or bud.
- Drying & trim room - Harvested flowers will be trimmed and hung to dry. Plant waste or “trim” will be passed on to the extraction process. The high-grade flower, once correctly dried, will move on for curing.
- Curing room - The correctly trimmed and dried flower will now be allowed to cure, or mature, in an environment that offers optimal temperature and humidity. Once perfectly cured the flower may be packed, either in bulk packages, or in individual, shelf-ready weights of one eighth, one quarter, and one half ounce.
- Extraction Room - This space will be equipped to facilitate the extraction of cannabis oils and tinctures from the cultivated popcorn bud, trim, and plant waste. Our environmentally-friendly process offers superior yields of food-grade cannabis extract while maintaining the distinctive flavor profiles that define our high-quality strains.
- Manufacturing Room - This space will be fitted and equipped to accommodate a commercial kitchen, preparation, and mixing equipment.
- Packaging Room - Here the final product will be prepared for transportation and delivery. This room will be equipped with state-of-the-art packaging and labelling equipment.

## **Design and Layout**

The light industrial nature of our chosen location provides an ideal space in which to create a properly designed cultivation space that provides the required environment to produce reliable, consistent cannabis crops. Indoor cultivation facilities inherently depend on intelligent grow lights that closely replicate the full spectrum of natural light that the plants require for optimal growth at each stage of their development. Air filtration and circulation systems are essential for controlling temperature and exhaust odors. The choice of systems will be closely dependent upon the lighting system chosen as these are the primary source of heat.

A variety of irrigation systems are typically employed for growing cannabis in an indoor environment, including hydroponic flood benches, and trough benches. Our facility will use drip irrigation as this offers extremely low water consumption and precision nutrient application. Nutrients are supplied through a fertigation system that feeds into the irrigation system. Careful nutrient management helps ensure the maximum production yield.

The ideal humidity is achieved and maintained through the carefully balanced application of commercial dehumidifiers, and air circulation. CO2 levels are carefully maintained and ensured by a centralized CO2 emission and monitoring system. Environmental automation lies at the heart of the operation. A computerized control system controls and monitors all the nutrient, light, air circulation, humidity, and irrigation needs of the plants.





# **Physical Security Plan**

## **The Building**

Our cultivation facility will be located on the 2nd and 3rd floors of 380 Dwight Street, Holyoke in Massachusetts. Our chosen location lies in a correctly-zoned, light industrial complex and has recently undergone extensive refurbishment with the replacement of the entire roof, a state-of-the-art fire and life safety systems, and the scheduled installation of an elevator serving all floors. The first floor of the building will contain two cannabis retail stores and a planned coffee shop together with a number of non-cannabis tenants. The building lies two blocks from the Holyoke Police Department and enjoys excellent intrinsic security features that make it ideal for the stringent security requirements of local and state regulations. Access to the 2nd and 3rd floors may only be made via the elevator or the two stairwells. Use of these entrances requires a swipe-card or key. All approaches, both inside and outside of the building are monitored by security cameras at all times. The City of Holyoke prefers that an external video camera with a direct feed to the Holyoke Police Department together with an armed, external guard, be placed and provided by all licensed cannabis establishments in the municipality.

The Cannabis Control Commission requires extensive, remotely-monitored video surveillance and alarm systems. All deliveries and shipments are loaded or unloaded within a secure sally port offering additional security for facility staff. Security systems will be provided by American Alarm, a leading provider with direct experience of the challenges of the licensed cannabis industry. All security plans will be approved by the Holyoke Police Department and the Commission prior to execution and following commissioning.

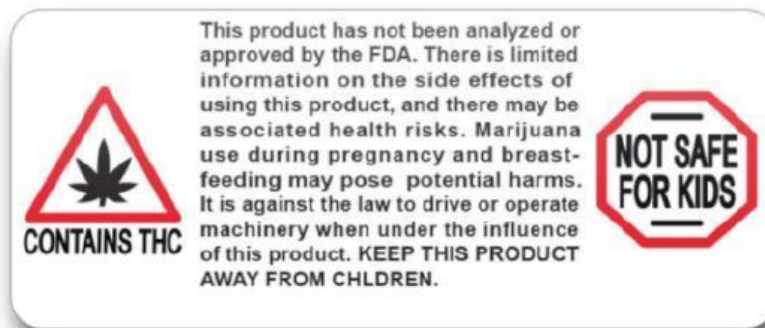
## **Transportation**

Transportation of cannabis between licensed Marijuana Establishments may only be carried out by registered Marijuana Establishment Agents using specially equipped and inspected vehicles. Each vehicle will have a climate control system which provides adequate temperature and humidity control. For security reasons, all transportation vehicles are unmarked. Each vehicle contains a lockable, purpose built, security cage that is securely fitted to the vehicle. All vehicles are equipped with a permanently mounted GPS tracking device and two, two-way communication systems.

## Packaging and Labeling

The Cannabis Control Commission has outlined strict regulations for packaging and labeling of cannabis products. This labeling includes information that clearly identifies the source, batch, type, and quantity of product together with a number of use warnings including the following statements:

1. Schedule 1 Controlled Substance
2. Keep out of reach of children and animals
3. The intoxicating effects of this product may be delayed by up to two hours
4. The product may impair the ability to drive or operate machinery. Please use extreme caution.



## Testing Requirements

No cannabis product may be sold wholesale, or at retail without first being tested by a CCC-licensed testing laboratory. ProVerde Laboratories, Inc. (PVL) in Medford, MA, will fulfill all laboratory testing requirements for the Company as per state regulations.

PVL can advise on:

- Production Facility design
- Strain selection and blending of strains to meet desired composition of material for production
- Development of delivery systems consistent with the regulations
- Develop a variety of dosing levels for the selected product line

- Develop a staffing plan for the lab and production quality control supervision for products being developed and produced in the facility

# Organizational Structure

## Leadership

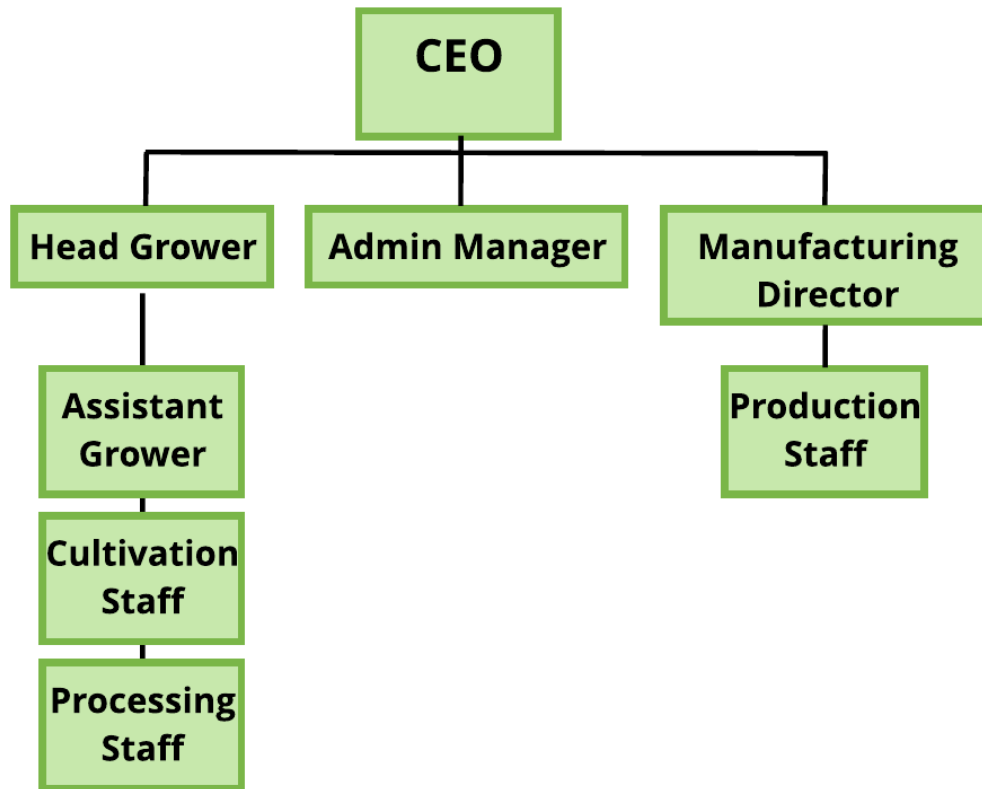
**Chief Executive Officer** – Damaris Aponte, a lifelong supporter of cannabis legalization comes from a background of medical office management and great customer service. Damaris has lived in Holyoke, since arriving from PR at the age of 3. Damaris owns her home in the city of Holyoke and is pursuing opening her cannabis business in the same city. She had worked in the medical field for 19 years and decided to change careers. With that change came the interest of her own cannabis business. Damaris enjoys volunteering in the community with cleans ups, food banks, community events, etc. She has taken a few certificates with Holyoke Community College that has led her to have a bigger interest in the cannabis industry. She has gotten a culinary cannabis certificate and a hydroponics course certificate. As a social equity applicant she sees Riverside Cannabis LLC a realistic and unmistakably lucrative venture, but also an opportunity to build a business that is a vehicle for positive change.

**Head Grower** – Juanito Perez, has almost two decades of medium-scale marijuana cultivation in the unregulated free market and enjoys an enviable reputation for both quality and yield. Juanito passion for marijuana is in part supported by the medical benefits realized following a diagnosis of ulcerative colitis in 2010.

**Compliance and Operations Support – Blue Skies Unlimited, LLC** Ezra Parzybok, principal consultant will provide compliance and operations management support services during the initial phases of start-up with an initial hands-on approach tapering off to a purely advisory role as the final operations and management team coalesces. Ezra is an acknowledged advisor on the medical uses of marijuana and the author of the book, *"Cannabis Consulting: Helping Patients, Parents, and Practitioners Understand Medical Marijuana"*. Ezra has extensive experience in operational management and the development of start-ups and fledgling enterprises, specializing in workflow management, systems management, administration, and compliance.

## **Board of Advisors**

Others to be determined



## **Personnel Plan**

Despite the management staff providing the essential knowledge and experience, cannabis cultivation is still relatively labor-intensive. When estimating the number of additional staff certain unknowns have been preemptively accounted for, including taking into account staffing needs against the background of everyday life. We have accordingly made allowances for sickness, personal days, vacations, and the like. The following positions will be filled to meet needs at full operation. The hiring schedule will be timed to meet production needs and is expected to roll out in accordance with the headcount table below:

## **Staffing Headcount**

	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
Chief Executive Officer	1	1	1	1	1
Chief Product Specialist	1	1	1	1	1
Master Grower	1	1	1	1	1
Asst Master Grower	2	2	2	2	2
Manufacturing Director	1	1	1	1	1
Warehouse Manager	1	1	1	1	1
Admin Manager	1	1	1	1	1
Cultivation Staff	4	4	8	8	8
Processing Staff	4	4	8	8	8
Production Staff	4	4	8	8	8
Edible Production Staff	2	2	4	4	4
Transportation Staff	1	1	1	1	1
Maintenance Staff	2	2	2	2	2

## Ownership

Ownership and equity in Riverside LLC will be divided among the principal shareholders in, as yet, undecided manner.

# Financial Plan

## Licensing

### Capex/Opex Capital

Our business plan demonstrates a need for \$1,334,080 in capital expenditure for space preparation, fit-out, systems, and equipment, \$565,920 to meet initial operational expenditure,

and an additional \$100,000 of contingency operational funds with the expectation of establishing a strategic cash reserve of \$500,000

### **License Application**

The process for license application is divided into three "packets." These packets may be submitted simultaneously or sequentially. Each packet must be approved before the next will be considered. However, all packages must be submitted before any review commences. All three packages must be fully approved before a provisional license will be granted. Once a provisional license has been granted the state will verify the approval of the relevant municipality. Subsequently, the state will perform specific inspections before issuing a full license. No cultivation or manufacture may begin before a full license has been granted.

### **Construction, Fit-out and Systems Acquisition**

The state of Massachusetts imposes substantial demands regarding systems and administration for Marijuana Establishment operators. State law provides powers to impose fines for violations of these regulations. Accordingly, it is essential that we ensure that our systems, policies, and administrative routines are robust, compliant and efficient before any state inspection and the subsequent commencement of operations.

Riverside facilities and equipment will be constructed, installed and commissioned under the supervision of an expert indoor grow system vendor. The "breaking ground" to "ribbon-cutting" timeline is estimated to be 6 months. Order and acquisition of the technical systems must be done as early in the process as possible to mitigate potential lead-time conflicts.

### **First Seed and First Sales**

Once the above steps have been taken propagation of our first batch of cannabis may begin. Initial crops will use selected strains with shorter growing times that will allow us to rapidly harvest and generate revenue. Once harvested, the plants will be divided into flower, popcorn bud, and trim. All of the flower will be trimmed, dried, and cured for use in our pure flower product, while the popcorn bud and trim will be macerated and used in the extraction process for our THC-infused products. Finished products will be packaged and prepared for delivery to our retail outlets or to be sold wholesale to other vendors in "shelf-ready" packaging.

### **Price/Profitability Projections**

It's important to note a few keys to this plan and how pro forma projections have been calculated. Our yields are conservatively based on known standards in the industry which this plan has rounded down by approximately 10-20%. For example, we have calculated a yield of 40g of flower per sq/ft of canopy in the flowering sections of the facility. We know, based on experience, that we can produce closer to 50g per sq/ft., however. We have chosen to adopt a conservative approach to yield estimation as a form of contingency. Similarly, we intend to use

a portion of our concentrate to make edibles. Concentrate used in this manner will create a product that offers a 2-3 times greater profit margin than sales of concentrate alone. It is both challenging and speculative to estimate the likely sales of edibles at this stage. Therefore, for the purposes of this business plan, we have chosen to demonstrate projections based on sales of concentrate alone rather than sales of edibles. This, again, allows us to demonstrate a conservative default position as a form of contingency.

Sales price points have been estimated following a study of the sales patterns and trends in the states of Colorado, California, Washington, and Oregon. Since these states have a longer cannabis sales history than Massachusetts, their pricing trends over the past 2-3 years are useful and relevant to our projections. We have also considered current black-market pricing in Massachusetts along with the Cannabis Benchmark.

## Assumptions

The following pro forma financial statements are based upon a number of financial assumptions:

- An average Massachusetts wholesale cannabis price of \$2,000
- 3% inflation year-on-year
- 3% increase in market prices year-on-year
- Anticipated yield around 3,250 lbs of pure flower (or bud), and a further 3,583 lbs of trim per year (increasing in year three to 6,500 lbs of flower, and 7,166 lbs of trim per year).

## IRS Code 280E

Riverside's profit and loss projection includes several idiosyncratic factors associated with a cannabis cultivation operation. Firstly, revenue fluctuations are a result of harvest cycle timing. Management will work to refine these cycles to normalize revenues as efficiently as possible. Our corporation tax forecast takes into consideration the impact of IRS 280E on marijuana-related businesses. In summary, certain operating expenses are deemed non-deductible for federal income tax purposes. These expenses are identified as "SG&A" expenses in our forecast (see Assumption Summary). **Our forecast assumes that on average 34% of total operating expenses are deemed "non-deductible".** If and when the federal government passes legislation such that these expenses become tax-deductible, ABL's bottom line will improve significantly.



## PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

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

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

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

## **QUALITY CONTROL AND TESTING**

### **Quality Control**

Riverside Cannabis LLC (“Riverside”) will comply with the following sanitary requirements:

1. Any Riverside 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 Riverside 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. Riverside’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Riverside’s 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. Riverside’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Riverside 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 500.105(12);
6. Riverside’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Riverside’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Riverside’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Riverside 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. Riverside acknowledges and understands that the Commission may require Riverside to demonstrate the intended and actual use of any toxic items found on Riverside’s premises;

11. Riverside 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 Riverside's needs;
12. Riverside's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. Riverside will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Riverside 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. Riverside 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.

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

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

Riverside 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 Riverside to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

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

#### Testing

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

Any Independent Testing Laboratory relied upon by Riverside for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited

to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

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

Riverside's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. Riverside acknowledges and understands that the Commission may require additional testing.

Riverside's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Riverside 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.

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

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

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

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

#### Quality Control Samples

Riverside may create a sample of Marijuana flower (“Marijuana”) to be provided internally to employees for purposes of ensuring product quality and making determinations about whether to sell the Marijuana. Quality Control Samples and employee feedback regarding such samples will allow Riverside to produce the highest quality Marijuana Products for distribution on the adult use market.

Quality Control Samples provided to employees may not be consumed on Riverside’s Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. Riverside will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they will be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as “Quality Control Sample.”

Quality Control Samples will have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: “QUALITY CONTROL SAMPLE NOT FOR RESALE”;
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, Riverside will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and
4. The name of the employee as it appears on their agent registration card.

## **PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS**

### **Overview**

Riverside Cannabis LLC (“Riverside”) will securely maintain personnel records, including registration status and background check records. Riverside 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 marijuana establishment 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 500.030.

### **Agent Personnel Records**

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

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; 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 Riverside will undergo a detailed background investigation prior to being granted access to a Riverside facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Riverside pursuant to 935 CMR 500.030 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 marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Riverside 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 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Riverside will:
  - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
  - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Riverside 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 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Riverside or the Commission.

Personnel Policies and Training

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

Riverside 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 Riverside 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**

Riverside Cannabis LLC (“Riverside”) 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 Riverside documents. Records will be stored at Riverside 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 Riverside 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 Riverside’s quarter-end closing procedures. In addition, Riverside’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- **Corporate Records**

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

- 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 Marijuana Establishment 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 Riverside.
- 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 marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Riverside and will include, at a minimum, the following:
      - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
      - Documentation of verification of references;
      - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
      - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
      - Documentation of periodic performance evaluations; 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 operating conditions;
    - Personnel policies and procedures; and
    - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
  - Riverside 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
  - Riverside 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 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Incident Reporting Records

- Within ten (10) calendar days, Riverside will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
- All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Riverside 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 Riverside’s jurisdiction on request.
- Visitor Records
  - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor’s name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
  - When marijuana or marijuana products are disposed of, Riverside 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 Riverside agents present during the disposal or other handling, with their signatures. Riverside will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
  - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
  - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
  - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Riverside is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
  - Riverside 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 Riverside’s vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
  - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating

the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).

- Responsible Vendor Training

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

- Closure

- In the event Riverside closes, all records will be kept for at least two (2) years at Riverside's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Riverside 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 Riverside's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

- Security measures in compliance with 935 CMR 500.110;
- Employee security policies, including personal safety and crime prevention techniques;
- A description of Riverside's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana in compliance with 935 CMR 500.105(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 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(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 Riverside 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 Riverside, 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 Riverside's website.
- Policies and procedures for the handling of cash on Riverside 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 to individuals younger than 21 years old.
- 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 shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
  - Riverside shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

#### Record-Retention

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

## **MAINTAINING OF FINANCIAL RECORDS**

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

- 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 500.105(9) are followed, including:
  - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
    - Assets and liabilities;
    - Monetary transactions;
    - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    - Sales records including the quantity, form, and cost of marijuana products; and
    - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Riverside.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
  - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
  - 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 Riverside 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 shall immediately disclose the information to the Commission; 2. it shall 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 500.105.
  - 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 500.
- Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
- Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
- Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records
  - Riverside shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.



## QUALIFICATIONS AND TRAINING

Riverside Cannabis LLC (“Riverside”) will ensure that all employees hired to work at a Riverside facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

### Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

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

### Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Riverside’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A Riverside Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-RVT may be conducted in-house by Riverside or by a third-party vendor engaged by the Riverside. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All Riverside Agents that are involved in the handling or 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.

### *Basic Core Curriculum*

Riverside Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- 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 the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.

- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
  - How to check identification;
  - Spotting and confiscating fraudulent identification;
  - Common mistakes made in identification verification.
  - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Riverside Agents which shall include:
  - Conduct of Riverside Agents;
  - Permitting inspections by state and local licensing and enforcement authorities;
  - Local and state licensing and enforcement, including registration and license sanctions;
  - Incident and notification requirements;
  - Administrative, civil, and criminal liability;
  - Health and safety standards, including waste disposal;
  - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
  - Permitted hours of operation;
  - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
  - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

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

After successful completion of the Basic Core Curriculum, each Riverside Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for Riverside to maintain designation as a Responsible Vendor. Once the Riverside Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

## **ENERGY COMPLIANCE PLAN**

Riverside Cannabis LLC (“Riverside”) has developed the following Energy Compliance Plan to ensure that its proposed Cultivation facility remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.103(1)(b), 500.105(1)(q), 500.105(15) and 500.120(11). Riverside will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

### **Energy Efficiency and Equipment Standards**

Riverside will maintain compliance at all times with the Commission’s minimum energy efficiency and equipment standards 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. Riverside will adopt and use additional best management practices as determined by the Commission to reduce energy.

### **Building Envelope**

The building envelope for Riverside’s cultivation facility will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code.

### **Lighting**

Riverside’s lighting at the facility will meet the following compliance requirements:

1. Horticulture Lighting Power Density will not exceed 50 watts per square foot; or
2. 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 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).

In the event that Riverside seeks to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission, Riverside will seek a waiver pursuant to 935 CMR 500.850 and provide documentation of third-party certification of the energy efficiency features of the proposed lighting.

Riverside will establish and document safety protocols to protect workers (e.g., eye protection near operating Horticultural Lighting Equipment).

### **Strategies to Reduce Electric Demand**

Riverside is pursuing the following strategies to reduce electric demand. Riverside will work with contractors to create an energy efficient lighting plan and plans on implementing low

amperage/wattage LED lighting wherever possible. Programs may include lighting schedules, active load management, and energy storage programs.

As the need and opportunity for facility upgrades and maintenance arise in the future, Riverside will continue to evaluate strategies to reduce electric demand.

#### Opportunities for Engagement with Energy Efficiency Programs

Riverside also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to identify other potential energy saving programs and initiatives. Riverside will also coordinate with its utility companies to explore any energy efficiency options available to Riverside.

#### HVAC and Dehumidification

Riverside's 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 C403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code). As part of the documentation required under 935 CMR 500.120(11)(b), Riverside will provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.

## Summary Overview

In accordance with 935 CMR 500.101(1)(c)(8)(k), Applicant submits the following Diversity Plan. Applicant is an equity applicant, minority owned woman company, seeking to operate a cannabis business in the city of Holyoke. As a minority woman, the support of diversity is a major principle of the Company. Applicant is committed to being an agent of positive change and seeks to ensure that it supports the diversity of the growing company.

Applicant is committed to creating an inclusive, respectful, and safe community that will actively confront and challenge racism, sexism, homophobia, transphobia, religious bigotry, and other forms of harassment and discrimination.

Applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment. Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

## Diversity Goals

Applicant will implement the following Diversity Plan that promotes and ensures equity in its operations by attracting, employing, elevating, and retaining board members, contractors, executives, employees, managers, and service providers from diverse and underrepresented groups including women; minorities; persons with disabilities; LGBTQ+ persons; and veterans (collectively, "Underrepresented Communities") and subject to the Suitability standards set forth in 935 CMR 500.800, et seq.

Applicant's Diversity Plan goal is to hire and maintain a workforce that is comprised of at least 70% women, minorities, person with disabilities, LGBTQ+, and veterans as outlined below:

- 60% women
- 50% minority
- 10% veterans
- 10% LGBTQ+
- 10% persons with disabilities.

By employing a workforce of individuals from diverse backgrounds and cultural groups. Applicant will hire most of its employees from within the city's different cultural community.

## Programs

The following programs will help effectuate the above goals:

1. Employment opportunities- when available- The company will host at least one live job fair annually in the city of Holyoke. It will be held at 20 Cabot Street. It will be published in the local newspaper, Indeed.com, and Masslive.com with the objective of reaching women, minorities, person with disabilities, LGBTQ+ and veterans.
2. Distribute internal workplace information notices, annually, aimed at encouraging current employees to recommend PTGs for employment.
3. Participate in job and recruitment fairs- no less than annually when employees are needed- that specifically target the PTG.
4. PTG will be offered opportunities to shadow their immediate supervisor to help achieve a transfer of the skills, knowledge, and responsibilities that this role demands.

## Measurements

Ideally, a cross-section of the individuals that are employed by our company should reflect the demographic make-up of the community that we serve. To that end we intend to focus our efforts on the following metrics annually upon renewal of licensure:

1. Have five employment positions been created since initial licensure?
2. Have we advertised available positions in diverse media with the objective of more effectively reaching PTG?
3. Have we attended at least one job and recruitment fair that specifically targets PTG?
4. Have PTG been hired and retained for at least 70% of the available positions?
5. Have women and/or veterans been offered opportunities to engage in shadow training?
6. How many PTG have chosen to engage in shadow training?