



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282672
Original Issued Date: 07/27/2021
Issued Date: 07/27/2021
Expiration Date: 07/27/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Sira Naturals, Inc.

Phone Number: 617-833-2077 Email Address: AODian@siranaturals.org

Business Address 1: 300 Trade Center Drive Business Address 2: Suite 7700

Business City: Woburn Business State: MA Business Zip Code: 01801

Mailing Address 1: 300 Trade Center Drive Mailing Address 2: SUITE 7700

Mailing City: WOBURN Mailing State: MA Mailing Zip Code: 01801

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RP201855

RMD INFORMATION

Name of RMD: SIRA NATURALS, INC.

Department of Public Health RMD Registration Number: RMD-245

Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control: 20

Role: Director Other Role:

First Name: LOUIS Last Name: KARGER Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control: 20

Role: Director Other Role:

First Name: DAVID Last Name: ROSENBERG Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control: 20

Role: Director Other Role:

First Name: ERIC Last Name: WARDROP Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 10 Percentage Of Control: 20

Role: Director Other Role:

First Name: JONATHAN Last Name: SANDELMAN Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: Percentage Of Control:

Role: Executive / Officer Other Role:

First Name: Jennifer Last Name: Drake Suffix:

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 6

Percentage Of Ownership: Percentage Of Control:

Role: Director Other Role: Director of parent company

First Name: Charles Last Name: Miles Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 7

Percentage Of Ownership: Percentage Of Control:

Role: Director Other Role: Director of parent company

Date generated: 09/24/2021

First Name: Mark Last Name: Pitchford Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 8

Percentage Of Ownership: Percentage Of Control:
Role: Director Other Role: Director of parent company
First Name: Chris Last Name: Burggraeve Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 9

Percentage Of Ownership: Percentage Of Control:
Role: Executive / Officer Other Role: Executive of parent company
First Name: Brad Last Name: Asher Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership:
Entity Legal Name: CSAC Acquisitions, Inc. Entity DBA: DBA City:
Entity Description: CSAC Acquisition, Inc. is a Nevada corporation
Foreign Subsidiary Narrative:
Entity Phone: 917-513-6418 Entity Email: jsandelman@mercerparklp.com Entity Website:
Entity Address 1: 8275 South Eastern Avenue Entity Address 2: #200
Entity City: Las Vegas Entity State: NV Entity Zip Code: 89123
Entity Mailing Address 1: 8275 South Eastern Avenue Entity Mailing Address 2:
Entity Mailing City: Las Vegas Entity Mailing State: NV Entity Mailing Zip Code: 89123
Relationship Description: Owner of Sira Naturals, Inc.

Entity with Direct or Indirect Authority 2

Percentage of Control: Percentage of Ownership:
Entity Legal Name: CSAC Holdings, Inc. Entity DBA: DBA City:
Entity Description: CSAC Holdings, Inc. is a Nevada corporation engaged in the business of directly or indirectly holding interests in cannabis entities in the United States
Foreign Subsidiary Narrative:
Entity Phone: 917-513-6418 Entity Email: jsandelman@mercerparklp.com Entity Website:
Entity Address 1: 8275 South Eastern Avenue Entity Address 2: #200
Entity City: Las Vegas Entity State: NV Entity Zip Code: 89123
Entity Mailing Address 1: 8275 South Eastern Avenue Entity Mailing Address 2: #200

Entity Mailing City: Las Vegas

Entity Mailing State: NY

Entity Mailing Zip

Code: 89123

Relationship Description: CSAC Holdings, Inc. has 100% of the voting control and CSAC Percentage of the entire ownership of the CSAC Acquisition, Inc.

Entity with Direct or Indirect Authority 3

Percentage of Control:

Percentage of Ownership: 100

Entity Legal Name: Ayr Strategies Inc.

Entity DBA:

DBA City:

Dedham

Entity Description: Ayr Strategies Inc. is incorporated under the laws of the Province of Ontario Canada.

Foreign Subsidiary Narrative:

Entity Phone: 917-513-6418

Entity Email:

Entity Website:

jsandelman@mercerparklp.com

Entity Address 1: 590 Madison Avenue

Entity Address 2: 26th Floor

Entity City: New York

Entity State: NY

Entity Zip Code: 10022

Entity Mailing Address 1: 590 Madison Avenue

Entity Mailing Address 2: 26th Floor

Entity Mailing City: New York

Entity Mailing State: NY

Entity Mailing Zip Code:

10022

Relationship Description: Ayr Strategies Inc. holds 100% of the control and equity of CSAC Holdings, Inc.

Entity with Direct or Indirect Authority 4

Percentage of Control:

Percentage of Ownership: 10

Entity Legal Name: Mercer Park CB, LP

Entity DBA:

DBA

City:

Entity Description: Mercer Park CB, LP is a Delaware limited partnership formed for the purpose of being engaged in the business of holding interests in cannabis entities

Foreign Subsidiary Narrative:

Entity Phone: 917-513-6418

Entity Email:

Entity Website:

jsandelman@mercerparklp.com

Entity Address 1: 590 Madison Avenue

Entity Address 2: 26th Floor

Entity City: New York

Entity State: NY

Entity Zip Code: 10022

Entity Mailing Address 1: 590 Madison Avenue

Entity Mailing Address 2: 26th Floor

Entity Mailing City: New York

Entity Mailing State: NY

Entity Mailing Zip Code:

10022

Relationship Description: Mercer Park CB LP owns in excess of 10% of Cannabis Strategies Acquisition Corp and 63% of the voting power over Cannabis Strategies Acquisition Corp.

Entity with Direct or Indirect Authority 5

Percentage of Control:

Percentage of Ownership: 10

Entity Legal Name: Mercer Park CB GP, LLC

Entity DBA:

DBA

City:

Entity Description: Mercer Park CB GP, LLC is a Delaware limited liability company formed for the purpose of being the general partner of Mercer Park CB, LP

Foreign Subsidiary Narrative:

Entity Phone: 917-513-6418

Entity Email:

Entity Website:

jsandelman@mercerparklp.com

Entity Address 1: 590 Madison Avenue

Entity Address 2: 26th Floor

Entity City: New York Entity State: NY Entity Zip Code: 10022
Entity Mailing Address 1: 590 Madison Avenue Entity Mailing Address 2: 26th Floor
Entity Mailing City: New York Entity Mailing State: NY Entity Mailing Zip Code: 10022

Relationship Description: Mercer Park CB GP, LLC is the sole general partner of Mercer Park CB, LP

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Michelle Last Name: Foley Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Regional Dispensary Manager.

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Sira Naturals, Inc. Entity DBA:
Email: lkarger@siranaturals.org Phone: 717-319-8546
Address 1: 300 Trade Center Drive Address 2:
City: Woburn State: MA Zip Code: 01801
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$200000 Percentage of Initial Capital: 100
Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Owner Last Name: Owner Suffix:
Entity Legal Name: Tahoe-Reno Botanicals, LLC Entity DBA: KYND Cannabis Company
Entity Description: Cannabis cultivation
Entity Phone: Entity Email: Entity Website:
775-786-0100 info@washowellness.com
Entity Address 1: 1645 Crane Way Entity Address 2:
Entity City: Sparks Entity State: NV Entity Zip Code: 89431 Entity Country: USA
Entity Mailing Address 1: 1645 Crane Way Entity Mailing Address 2:
Entity Mailing City: Sparks Entity Mailing State: NV Entity Mailing Zip Code: Entity Mailing Country:
89431 USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Owner Last Name: Owner Suffix:
Entity Legal Name: Tahoe-Reno Extractions, LLC Entity DBA: KYND Cannabis Company
Entity Description: Cannabis manufacturing and production
Entity Phone: Entity Email: Entity Website:
775-786-0100 info@washowellness.com
Entity Address 1: 1645 Crane Way Entity Address 2:
Entity City: Sparks Entity State: NV Entity Zip Code: 89431 Entity Country: USA

Entity Mailing Address 1: 1645 Crane Way
Entity Mailing City: Sparks Entity Mailing State: NV
Entity Mailing Address 2:
Entity Mailing Zip Code: 89431 Entity Mailing Country: USA

Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: Owner Last Name: Owner Suffix:
Entity Legal Name: Kynd-Strainz, LLC Entity DBA: MYNT Cannabis Company
Entity Description: Dispensary
Entity Phone: 775-686-6968 Entity Email: info@myntcannabis.com Entity Website:
Entity Address 1: 132 E. 2nd Street Entity Address 2:
Entity City: Reno Entity State: NV Entity Zip Code: 89501 Entity Country: USA
Entity Mailing Address 1: 132 E. 2nd Street Entity Mailing Address 2:
Entity Mailing City: Reno Entity Mailing State: NV Entity Mailing Zip Code: 89501 Entity Mailing Country: USA

Business Interest in Other State 4

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: Owner Last Name: Owner Suffix:
Entity Legal Name: Lemon Aide, LLC Entity DBA: MYNT Cannabis Company
Entity Description: Dispensary
Entity Phone: 775-686-6968 Entity Email: info@myntcannabis.com Entity Website:
Entity Address 1: 340 Lemmon Drive Entity Address 2:
Entity City: Reno Entity State: NV Entity Zip Code: 89506 Entity Country: USA
Entity Mailing Address 1: 340 Lemmon Drive Entity Mailing Address 2:
Entity Mailing City: Reno Entity Mailing State: NV Entity Mailing Zip Code: 89506 Entity Mailing Country: USA

Business Interest in Other State 5

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: Owner Last Name: Owner Suffix:
Entity Legal Name: LivFree Wellness LLC Entity DBA: The Dispensary
Entity Description: Dispensary
Entity Phone: 702-476-0420 Entity Email: info@thedispensarynv.com Entity Website:
Entity Address 1: 100 W. Plumb Lane Entity Address 2:
Entity City: Reno Entity State: NV Entity Zip Code: 89509 Entity Country: USA
Entity Mailing Address 1: 100 W. Plumb Lane Entity Mailing Address 2:
Entity Mailing City: Reno Entity Mailing State: NV Entity Mailing Zip Code: 89509 Entity Mailing Country: USA

Business Interest in Other State 6

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: Owner Last Name: Owner Suffix:

Entity Legal Name: LivFree Wellness LCC **Entity DBA:** The Dispensary
Entity Description: Dispensary
Entity Phone: 702-476-0420 **Entity Email:** info@thedispensaryny.com **Entity Website:**
Entity Address 1: 50 Gibson Road **Entity Address 2:** #170
Entity City: Henderson **Entity State:** NV **Entity Zip Code:** 89014 **Entity Country:** USA
Entity Mailing Address 1: 50 Gibson Road **Entity Mailing Address 2:** #170
Entity Mailing City: Henderson **Entity Mailing State:** NV **Entity Mailing Zip Code:** 89014 **Entity Mailing Country:** USA

Business Interest in Other State 7

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: **Owner Last Name:** **Owner Suffix:**
Entity Legal Name: LivFree Wellness LLC **Entity DBA:** The Dispensary
Entity Description: Dispensary
Entity Phone: 702-476-0420 **Entity Email:** info@thedispensaryny.com **Entity Website:**
Entity Address 1: 5347 S Decatur Blvd #100 **Entity Address 2:**
Entity City: Las Vegas **Entity State:** NV **Entity Zip Code:** 89118 **Entity Country:** USA
Entity Mailing Address 1: 5347 S Decatur **Entity Mailing Address 2:**
Entity Mailing City: Las Vegas **Entity Mailing State:** NV **Entity Mailing Zip Code:** 89118 **Entity Mailing Country:** USA

Business Interest in Other State 8

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: **Owner Last Name:** **Owner Suffix:**
Entity Legal Name: LivFree Wellness LLC **Entity DBA:** The Dispensary
Entity Description: Cannabis cultivation, production, and manufacturing
Entity Phone: 702-476-0420 **Entity Email:** info@thedispensarynv.com **Entity Website:**
Entity Address 1: 3900 Ponderosa Way **Entity Address 2:**
Entity City: Las Vegas **Entity State:** NV **Entity Zip Code:** 89118 **Entity Country:** USA
Entity Mailing Address 1: 3900 Ponderosa Way **Entity Mailing Address 2:**
Entity Mailing City: Las Vegas **Entity Mailing State:** NV **Entity Mailing Zip Code:** 89118 **Entity Mailing Country:** USA

Business Interest in Other State 9

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner
Owner First Name: **Owner Last Name:** **Owner Suffix:**
Entity Legal Name: LivFree Wellness LLC **Entity DBA:** The Dispensary
Entity Description: Cannabis cultivation, production and manufacturing
Entity Phone: 702-476-0420 **Entity Email:** info@thedispensarynv.com **Entity Website:**
Entity Address 1: 435 Eureka Avenue **Entity Address 2:**
Entity City: Reno **Entity State:** NV **Entity Zip Code:** 89512 **Entity Country:** USA
Entity Mailing Address 1: 435 Eureka Avenue **Entity Mailing Address 2:**

Entity Mailing City: Reno Entity Mailing State: NV Entity Mailing Zip Code: 89512 Entity Mailing Country: USA

Business Interest in Other State 10

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Owner Last Name: Owner Suffix:

Entity Legal Name: CannaPunch of Nevada LLC Entity DBA:

Entity Description: Cannabis extraction, manufacturing, and distribution

Entity Phone: 702-749-6437 Entity Email: hrnv@cannapunch.com Entity Website:

Entity Address 1: 3790 Paradise Road Entity Address 2:

Entity City: Las Vegas Entity State: NV Entity Zip Code: 89169 Entity Country: USA

Entity Mailing Address 1: 3790 Paradise Road Entity Mailing Address 2:

Entity Mailing City: Las Vegas Entity Mailing State: NV Entity Mailing Zip Code: 89169 Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Louis Last Name: Karger Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 2

First Name: Louis Last Name: Karger Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 3

First Name: Louis Last Name: Karger Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 4

First Name: Louis Last Name: Karger Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 5

First Name: David Last Name: Rosenberg Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 6

First Name: David Last Name: Rosenberg Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. Business Type: Marijuana Cultivator

Marijuana Establishment City: Milford Marijuana Establishment State: MA

Individual 7

First Name: David Last Name: Rosenberg Suffix:

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 8

First Name: David **Last Name:** Rosenberg **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 9

First Name: Eric **Last Name:** Wardrop **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 10

First Name: Eric **Last Name:** Wardrop **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 11

First Name: Eric **Last Name:** Wardrop **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 12

First Name: Eric **Last Name:** Wardrop **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 13

First Name: Jonathan **Last Name:** Sandelman **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 14

First Name: Jonathan **Last Name:** Sandelman **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 15

First Name: Jonathan **Last Name:** Sandelman **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 16

First Name: Jonathan **Last Name:** Sandelman **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 17

First Name: Jennifer **Last Name:** Drake **Suffix:**

Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 18

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 19

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:**
MA

Individual 20

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 21

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 22

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 23

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 24

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 25

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 26

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 27

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 28

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 29

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 30

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 31

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:**
MA

Individual 32

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 33

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 34

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 35

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 36

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Transporter with Other Existing ME License
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 37

First Name: Louis **Last Name:** Karger **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 38

First Name: David **Last Name:** Rosenberg **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 39

First Name: Eric **Last Name:** Wardrop **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 40

First Name: Jonathan **Last Name:** Sandelman **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 41

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 42

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 43

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 44

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 45

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Watertown **Marijuana Establishment State:** MA

Individual 46

First Name: Louis **Last Name:** Karger **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 47

First Name: Louis **Last Name:** Karger **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 48

First Name: David **Last Name:** Rosenberg **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 49

First Name: David **Last Name:** Rosenberg **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 50

First Name: Eric **Last Name:** Wardrop **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Sira Naturals, Inc. **Marijuana Establishment State:** MA

Individual 51

First Name: Eric **Last Name:** Wardrop **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 52

First Name: Jonathan **Last Name:** Sandelman **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 53

First Name: Jonathan **Last Name:** Sandelman **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 54

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 55

First Name: Jennifer **Last Name:** Drake **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:**
MA

Individual 56

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 57

First Name: Charles **Last Name:** Miles **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 58

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 59

First Name: Mark **Last Name:** Pitchford **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 60

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 61

First Name: Chris **Last Name:** Burggraeve **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:**
MA

Individual 62

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

Individual 63

First Name: Brad **Last Name:** Asher **Suffix:**
Marijuana Establishment Name: Sira Naturals, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Milford **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 240 Elm Street
Establishment Address 2:
Establishment City: Somerville **Establishment Zip Code:** 02144
Approximate square footage of the establishment: 4983 **How many abutters does this property have?:** 1
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with	Sira Somerville Plan to Remain Compliant with	pdf	5fa84e0508242707d4a778f4	11/08/2020

Local Zoning	Local Zoning 10.27.20.pdf			
Certification of Host	Sira Naturals HCA Certification Form	pdf	6022f0574dba6f360b67f076	02/09/2021
Community Agreement	Executed.pdf			
Community Outreach Meeting	Sira Somerville VCOM Attestation Packet	pdf	6022f05e238c3036b0f85792	02/09/2021
Documentation	2.3.21_compressed.pdf			

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	Sira Naturals Plan for Positive Impact 4.7.21.pdf	pdf	606f73db7eb80444db466aec	04/08/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Director Other Role:
 First Name: Louis Last Name: Karger Suffix:
 RMD Association: RMD Manager
 Background Question: no

Individual Background Information 2

Role: Director Other Role:
 First Name: David Last Name: Rosenberg Suffix:
 RMD Association: RMD Manager
 Background Question: yes

Individual Background Information 3

Role: Director Other Role:
 First Name: Eric Last Name: Wardrop Suffix:
 RMD Association: RMD Manager
 Background Question: no

Individual Background Information 4

Role: Director Other Role:
 First Name: Jonathan Last Name: Sandelman Suffix:
 RMD Association: RMD Manager
 Background Question: no

Individual Background Information 5

Role: Director Other Role: Director of parent company
 First Name: Chris Last Name: Burggraeve Suffix:
 RMD Association: RMD Manager

Background Question: no

Individual Background Information 6

Role: Director Other Role: Director of parent company

First Name: Charles Last Name: Miles Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 7

Role: Executive / Officer Other Role: Executive in parent company

First Name: Brad Last Name: Asher Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 8

Role: Director Other Role: Director of parent company

First Name: Mark Last Name: Pitchford Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 9

Role: Director Other Role: Director of parent company

First Name: Jennifer Last Name: Drake Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 10

Role: Manager Other Role:

First Name: Michelle Last Name: Foley Suffix:

RMD Association: RMD Manager

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company Other Role:

Entity Legal Name: CSAC Acquisitions, Inc. Entity DBA:

Entity Description: Nevada corporation engaged in the business of holding interests in cannabis entities

Phone: 917-513-6418 Email: jsandelman@mercerparklp.com

Primary Business Address 1: 8275 South Eastern Avenue Primary Business Address 2: #200

Primary Business City: Las Vegas Primary Business State: NV Principal Business Zip Code: 89123

Additional Information:

Entity Background Check Information 2

Role: Parent Company Other Role:

Entity Legal Name: CSAC Holdings, Inc. Entity DBA:

Entity Description: Nevada corporation

Date generated: 09/24/2021

Phone: 917-513-6418 Email: jsandelman@mercerparklp.com
 Primary Business Address 1: 8275 South Eastern Avenue Primary Business Address 2: #200
 Primary Business City: Las Vegas Primary Business State: NV Principal Business Zip Code: 89123

Additional Information:

Entity Background Check Information 3

Role: Parent Company Other Role:
 Entity Legal Name: Ayr Strategies, Inc. Entity DBA:
 Entity Description: Incorporated under the laws of the Province of Ontario Canada
 Phone: 917-513-6418 Email: jsandelman@mercerparklp.com
 Primary Business Address 1: 590 Madison Avenue Primary Business Address 2: 26th Floor
 Primary Business City: New York Primary Business State: NY Principal Business Zip Code:
 10022

Additional Information:

Entity Background Check Information 4

Role: Parent Company Other Role:
 Entity Legal Name: Mercer Park CB LP Entity DBA:
 Entity Description: Delaware limited partnership
 Phone: 917-513-6418 Email: jsandelman@mercerparklp.com
 Primary Business Address 1: 590 Madison Avenue Primary Business Address 2: 26th Floor
 Primary Business City: New York Primary Business State: NY Principal Business Zip Code: 10022

Additional Information:

Entity Background Check Information 5

Role: Parent Company Other Role:
 Entity Legal Name: Mercer Park CB GP, LLC Entity DBA:
 Entity Description: Mercer Park CB GP, LLC is a Delaware limited liability company
 Phone: 917-513-6418 Email: jsandelman@mercerparklp.com
 Primary Business Address 1: 590 Madison Avenue Primary Business Address 2: 26th Floor
 Primary Business City: New York Primary Business State: NY Principal Business Zip Code:
 10022

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	Sira Naturals Bylaws.pdf	pdf	5fa8513fdd2d7407bedebc3b	11/08/2020
Bylaws	Cert of Good Standing_Dept UI_1.25.21.pdf	pdf	6035284658692907c581adaa	02/23/2021
Department of Revenue - Certificate of Good standing	Cert of Good Standing_Dept of Revenue_2.25.21.pdf	pdf	60390a01183b5235aa44ba67	02/26/2021
Secretary of Commonwealth - Certificate of Good Standing	SoS Certificate of Good Standing 2.26.21.pdf	pdf	603e680e8d09dc35cbc0bc74	03/02/2021
Articles of Organization	Articles of Organization 3.16.21.pdf	pdf	60510ab0efe1e0359b95d8da	03/16/2021

No documents uploaded

Massachusetts Business Identification Number: 001312028

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Certificate of Insurance.pdf	pdf	5fa853618cc05c081b1b66cf	11/08/2020
Business Plan	BUSINESS PLAN_2020 APPLICATIONS.pdf	pdf	5fa853fe8cc05c081b1b66fd5	11/08/2020
Proposed Timeline	Sira Naturals Somerville Proposed Timeline 3.2.21.pdf	pdf	603e68ff40676f35abee063b	03/02/2021
Plan for Liability Insurance	Liability Insurance Summary 3.16.21.pdf	pdf	60510bbb79e02335ddb62da2	03/16/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Record Keeping procedures	CMO RECORD KEEPING PROCEDURES.pdf	pdf	603e6c3a40676f35abee0666	03/02/2021
Separating recreational from medical operations, if applicable	CMO Separating Recreational from Medical Operations.pdf	pdf	603e6c3c4e7ce735949cd47f	03/02/2021
Inventory procedures	INVENTORY PROCEDURES.pdf	pdf	603e6c3e93441135c0c316c8	03/02/2021
Personnel policies including background checks	PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS.pdf	pdf	603e6c5e93441135c0c316ce	03/02/2021
Energy Compliance Plan	RETAIL Energy and Efficiency Plan.pdf	pdf	603e6c78e15067356d20a3c6	03/02/2021
Quality control and testing	QUALITY CONTROL AND TESTING.pdf	pdf	603e6c794e7ce735949cd487	03/02/2021
Qualifications and training	QUALIFICATIONS AND TRAINING.pdf	pdf	603e6c7a9a694b3583a71bab	03/02/2021
Prevention of diversion	PREVENTION OF DIVERSION.pdf.pdf	pdf	603e6c7befe1e0359b95a633	03/02/2021
Restricting Access to age 21 and older	SIRA CMO RETAIL Limiting Access to Age 21 and Older.pdf	pdf	603e6ca1b64912358e312882	03/02/2021
Security plan	SECURITY PLAN.pdf	pdf	603e6ca2c997b43574a19f8d	03/02/2021
Storage of marijuana	RETAIL_STORAGE OF MARIJUANA.pdf	pdf	603e6ca2d7adff35b5a4de2a	03/02/2021
Plan for obtaining marijuana or marijuana products	RETAIL PLAN TO OBTAIN MARIJUANA.pdf	pdf	603e6ca3b3603835a49f2ed8	03/02/2021
Transportation of marijuana	TRANSPORTATION OF MARIJUANA.pdf.pdf	pdf	603e6ccac997b43574a19f91	03/02/2021
Maintaining of financial records	SIRA CMO RETAIL_MAINTAINING OF FINANCIAL RECORDS.pdf	pdf	603e6cccb3603835a49f2edc	03/02/2021
Dispensing procedures	SIRA CMO RETAIL_DISPENSING	pdf	603e6ccd8d09dc35cbc0bcb6	03/02/2021

PRODUCTS.pdf

Diversity plan Sira Naturals Diversity Plan 4.7.21.pdf pdf 606f73f686f403457678bf23 04/08/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

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

Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Sira Naturals, Inc. (“Sira”) is and will remain in compliance with local codes, ordinances and bylaws for the physical address of the retail marijuana establishment a 240 Elm Street, Somerville, MA 02144, which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

240 Elm Street is located in Commercial Business District and properly zoned pursuant to the Somerville Zoning Bylaws Section 9 Cannabis Retail Sales. In accordance with Section 9(d) the locations is at least three hundred (300) feet from any pre-primary, primary, or secondary Educational Services uses or any Educational Services Protected by M.G.L. 40A. Sec. 3. Furthermore, the location does not occupy more than ten thousand (10,000) square feet of floor area.

Sira filed a special permit petition with the City of Somerville to operate a cannabis retail location on November 16th, 2016. Sira appeared for a public hearing with the City of Somerville on January 18th, February 1st, February 15th and March 1st 2017 . On March 1st, 2017 the City of Somerville having received all pertinent data and special permit application documents moved to grant Sira a special permit to operate the cannabis retail establishment. The special permit was filed and recorded with the South Middlesex Registry of Deeds on March 23, 2017.

In addition to Sira remaining compliant with existing Zoning Ordinances; Sira will continuously engage with the City of Somerville officials to remain up to date with local zoning ordinances to remain fully compliant.



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:

Sira Naturals, Inc.

2. Name of applicant's authorized representative:

David Rosenberg, President

3. Signature of applicant's authorized representative:



4. Name of municipality:

City of Somerville

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

Mayor Joseph A. Curtatone

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).*):

mayor @ somerville ma. gov

8. Host community agreement execution date:

11 / 20 / 2020

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

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



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

a. Date of publication: & 1/20/21

b. Name of publication:

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

a. Date notice filed:

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

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:

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

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



Name of applicant:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



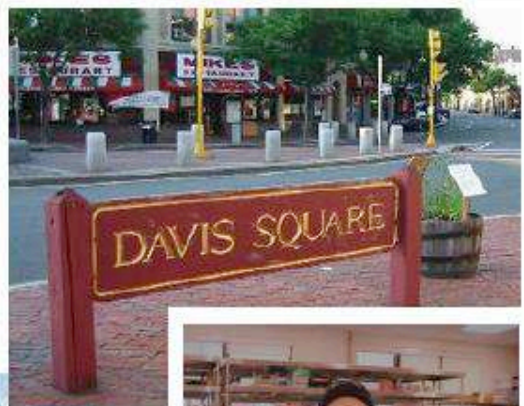


240 ELM STREET

Somerville, MA 02144

Community Outreach Meeting Summary

1/27/2021



300 Trade Center, Suite 7750 Woburn, MA 01801 T: (866) 420-SIRA (7472)
W: www.Siranaturals.org



Memo

Date: January 27, 2021

To: Ward 6 City Councilor, Lance Davis

CC: Charlotte Leis, City of Somerville Planner & Marijuana Advisory Committee and Zoning Board Liaison; John Long, City Clerk, City of Somerville

From: Sira Naturals, Inc.

Re: Summary of the Community Outreach Meeting Regarding the addition of adult use cannabis at the existing Sira Naturals medical marijuana facility located at 240 Elm Street in Davis Square, Somerville, Massachusetts 02144.

The purpose of this memorandum is to provide the City of Somerville and the Cannabis Control Commission with a comprehensive summary of the community outreach meeting hosted by Sira Naturals, Inc. on Wednesday, January 27, 2021 for the addition of adult use cannabis at the existing Sira Naturals medical marijuana facility located at 240 Elm Street in Somerville, Massachusetts. The community outreach meeting was approved by Ward 6 City Councilor Lance Davis on January 13, 2021 and held in accordance with local Community Meeting Requirements, as well as M.G.L. Ch. 94G and the Massachusetts Cannabis Control Commission's ("CCC") regulations found at 935 CMR 500.000 and 935 CMR 501.000 et seq. This was the second community outreach meeting conducted by Sira Naturals. The first was hosted by the City of Somerville on Thursday, January 7, 2021.

Pursuant to the CCC Executive Director's administrative order issued April 27, 2020, as well as local planning guidelines, this community outreach meeting was allowed to be held virtually via Sira's Zoom Webinar platform subject to a number of outreach and accessibility requirements, including, but not limited to live closed captioning, all of which were met and exceeded by the applicant, Sira Naturals, Inc.

Streaming video copies of this meeting were submitted to the City of Somerville, Councilor Davis, Somerville GovTV and have been made available on the proposed project's dedicated and publicly available website: <http://Siracommunity.com/somerville>.

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Meeting Summary

Pursuant to Massachusetts Cannabis Control Commission (“CCC”) requirements and City of Somerville Community Meeting Requirements, legal notice shall be provided at least once, at least 14-days prior to the date of the proposed community outreach meeting. Accordingly, notice for the public virtual community outreach meeting was published in the Somerville Times newspaper on January 13 and 20, 2021 (see Appendix A and B) and was filed with the City Clerk’s Office on January 13, 2021 (see Appendix C).

As required by State CCC regulations, Sira Naturals provided individualized notice to all abutters within a 300 foot radius of the proposed project at least seven calendar days prior to the community outreach meeting utilizing certified mail instead of the CCC-minimum requirement of standard mail (see Appendix D).

State CCC guidelines also require that all meeting materials are provided online to the public at least 24-hours before the community outreach meeting is scheduled to begin. Sira Naturals posted all meeting materials more than a week in advance of the meeting at <http://siracommunity.com/somerville>. To ensure accessibility of the virtual community outreach meeting by all residents, live closed captioning was provided during the meeting.

Finally, members of the public were noticed and encouraged to submit questions both in advance and following the community outreach meeting at community@siranaturals.org. No questions were submitted via email before the January 27 meeting.

Consistent with all provided legal notices, the public community outreach meeting began at 6 P.M. with 17 viewers in attendance. Attached as Appendices E and F are the slide deck and materials used for the presentation, as well as the entire meeting transcript respectively.

Meeting moderator and Somerville resident, Nolan Carrier, began the presentation outlining the agenda for the meeting, providing instructions on how to participate, and providing general meeting guidelines. He then gave the floor to David Rosenberg to begin Sira Naturals’ presentation.

David is an original founder and now President of Sira Naturals, as well as a Member of Sira’s Board of Directors. He is also the Founder and former CEO of Prime Motor Group. David introduced the other members of the Sira Team:

- Lou Karger, Sira Naturals Co-Founder, Treasurer and Member of the Board of Directors;
- Dwan Packnett, Vice President of Government Relations and Community Investment

- Michelle Foley, Regional Dispensary Manager

David expressed that Sira is dedicated to creating a cooperative relationship with Somerville and setting the example of what it means to be a good neighbor. He then provided some background on Somerville's overwhelming support for cannabis legalization, approving it 76% to 24% - which is an even larger margin than the state average. Sira Naturals is proposing to use their existing medical retail facility in Davis Square to co-locate an adult-use cannabis retail license at the same site. In fact, they secured 14.5 out of 15 points to be awarded a Host Community Agreement from the Somerville Marijuana Advisory Committee in order to move their project forward for consideration at Somerville Licensing Commission for a business license, and the Somerville Zoning Board of Appeals for a special permit.

Growing up on the North Shore and living in the greater Boston area his entire life, David is proud of Sira Naturals, its local roots and its great leadership team that has been and will continue to be focused on maintaining excellent relationships with their communities and neighbors. Furthermore, Sira Naturals was first cannabis company in Massachusetts to unionize, by voluntarily partnering with the UFCW Local 1445 to ensure living wages, competitive benefits and higher education opportunities for their workforce.

Since opening their doors in Somerville 3 years ago, being a good neighbor is a commitment they have always taken very seriously. From their partnership with the UFCW, to their Accelerator program and cofounding CultivatED, Sira works hard to set the example in Massachusetts. They are considered the gold standard for cannabis operations. In fact, the state Cannabis Control Commission uses their locations to demonstrate what a good operation should look like.

Sira Naturals' location is in the heart of Davis Square. As an experienced operator, they understand their responsibility to the Somerville community and meeting the highest expectations, especially with this location. They have employed state of the art design principles to minimize any disruption, or nuisance to surrounding commercial areas. Since opening, they have had to physically point out their location to many people that live or work in Davis Square, including some elected officials, who were unaware of their facility.

As a team, they couldn't be prouder of this -- because it means that their company is doing an excellent job of keeping their promise to the neighborhood and to the City of Somerville. Their approach is informed by their extensive experience and their intentional design principles.

Their facility is located at the basement level and is purposefully constructed to be modest, inconspicuous, safe, and secure. Sira Naturals has two entrances to their facility. One on Elm Street and one on Chester Street. There will be no outdoor queuing or lines, now or in the future.

They are very proud to have worked so closely with the City of Somerville to make their operations a success over the past 3 years. With regular security sweeps and an experienced staff that minimizes any disruption to the area, they believe they are the right operator to thoughtfully include adult-use cannabis sales as part of their existing operations in Davis Square.

They are proposing just two improvements to their facility, adding a few Point of Sale systems and optimizing their customer flow for faster transaction times. With 4900 square feet in the basement level, they have a large floorspace and hallways to que customers safely and maintain social distancing.

Subject to future discussions with the CCC and the City of Somerville, their proposed plans include all customers entering through a secure entrance and form three separate lines. Medical patients will take an immediate right (signalized by green lines) to the designated medical and express medical pick-up registers. Adult use customers will take an immediate left (signalized by yellow lines) to the designated express recreational pick-up registers, or they will que in the center of the space 6 feet apart if they do not have an express order – (signalized by a blue line). Those customers without an express order will enter the space and proceed straight towards the back wall where there is ample room to que 6 feet apart. All customers exit at the designated Chester Street exit. They also highlighted the general entrance and exit flow in red to demonstrate how customers begin and end their transactions.

David also noted that the exterior of their building will not change. “So, if you didn’t know where Sira was before, it’s going to be equally hard to know that we’re still there. We are not going to be a disruption, a problem, or a nuisance to Davis Square.”

They also plan to increase staff to further streamline operations. With more Adult Use stores opening in the area, there is a positive impact on traffic and lines. Unlike when NETA opened in Brookline in 2018 with huge lines when adult use was a novelty, as more stores begin to open in the area, they become less of a destination for consumers. However, should lines form, Sira’s security monitors allow them visibility to all sidewalks around the dispensary so they can react quickly, but they do not anticipate that happening. They have a highly efficient team, that gets customers through quickly, ensuring that there are no lines outside of their facility. They fully understand that shorter wait times correlate directly to the satisfaction of their guests, and their neighbors.

Before turning the presentation over to Dwan Packnett, David noted that their location at 240 Elm Street conforms with all applicable zoning and buffer zones that are in place in the City of Somerville.

Dwan went on to describe in more detail Sira Naturals’ diversity and inclusion plans, employment plans, and community investment. Founded in 2013, Sira is one of Massachusetts’ 1st “seed to sale” medical companies and has grown into one of the largest cannabis employers



with 230 employees. But what matters most to Dwan — and why she is so proud to be in the cannabis industry with her team — is Sira’s commitment to diversity and inclusion as a core value driving their success.

Sira Naturals created the first in the state Accelerator Program to support Economic Empowerment Entrepreneurs. They co-founded CultivatED, the first in the nation “jail-to-jobs” cannabis industry workforce training program. And, in partnership with UFCW Local 1445, they are creating a Union Apprentice Program to build a diverse workforce to fuel the future.

Sira Naturals is an important alternative point of entry into the cannabis industry for People of Color because their secure, living wage, union jobs and local management offers employees a broad range of jobs & opportunities for advancement – features unique to publicly traded companies like Sira — and a reason why companies like IBM and Coca-Cola have historically played such an important role to People of Color.

The cannabis industry is an economic engine for enormous and equitable community benefit, so they have radically rethought community engagement through their Sira.Community programs. Sira.community is a 3-phased equity driven Diversity & Inclusion and Employment Plan that seeks to deconstruct the stigma of cannabis by facing “head on” the complicated and racist history of cannabis in the United States. They describe the basics of the industry and explore the many opportunities for entrepreneurship or careers within the industry and at Sira.

Their “You can’t be what you can’t see!” seminars focus on community engagement in underrepresented communities. In fact, their first – “You can’t be what you can’t see!” informational seminar took place this past July with the Somerville Community Corporation – First Source.

The 2nd phase of Sira.Community is “There is a place for you in the Cannabis Industry,” their Workforce Development program in collaboration with UFCW Local 1445.

Lastly, through their Accelerator 2.0 program, Sira Fellows, they Empower Entrepreneurs - all Economic Empowerment applicants. They receive “hands on” mentorship and training to open and sustain retail stores across the state while gaining access to Sira’s manufacturing and distribution “know-how” and networks. They are pleased to report that the Cannabis Control Commission granted 3 licenses to Sira Fellows this past summer. The first store, Western Front, opened in November in Chelsea.

Dwan continued, in order to recruit, hire and retain a workforce that reflects the values of Somerville, they must first invest in their future employees’ neighborhoods. That’s why Sira will be contributing over \$475,000 per year in Somerville - in fees, in-kind contributions and cash investment in community organizations and activities - very similar to their partnership with the Community Action Agency of Somerville (CAAS).



Sira Naturals has voluntarily unionized their workforce, becoming the first and only Massachusetts cannabis company to do so! Their “Somerville First” hiring preference will focus on hiring workers from groups typically underrepresented in the cannabis industry – those from communities disproportionately impacted by the War on Drugs; people of color; women and veterans. Most critical to their employment plan is ensuring that a CORI record is not a barrier to entry in the cannabis industry or at Sira.

Mentioned earlier, Sira is a founding member of CultivatED, the nation’s first jail-to-jobs program for the cannabis industry. They make an annual contribution of \$25,000 working alongside their partners Roxbury Community College, Greater Boston Legal Service, the Urban League and Lawyers for Civil Rights.

Community is the most important aspect of their business. It defines who they are as a company. They already consider themselves deeply connected members of the Somerville community, whether through their discreetly located store at 240 Elm Street and the outstanding work of their smart and dedicated retail team; OR their collaboration with Somerville’s Medical Marijuana Community Benefits Association (CBA), where they work with the Health and Human Services Department to create meaningful prevention, diversion and mental health programs for children and young adults; OR their delivery of Personal Protective Equipment as a huge thank you to City of Somerville and Nurse Harris for her brilliant work comforting and counseling their Somerville employees during the initial outbreak of COVID nearly a year ago.

Although these are activities from their past, Sira has no intention of resting. They are hard at work building new programs in collaboration with Somerville community leaders like Yvette Wilks and her groundbreaking youth awareness and empowerment program utilizing a STEAM (Science – Technology – Engineering - ARTS & Math) methodology.

With that, Dwan passed the presentation over to Michelle Foley, their Regional Dispensary Manager to highlight some of the standards and procedures in place at their retail locations.

Sira Naturals prides themselves on having a professional and welcoming atmosphere in their dispensaries. Sira’s retail workers are screened thoroughly to ensure they add to the professional environment in our stores. The Sira retail team is comprised of industry professionals, high volume retail experts, and friendly and knowledgeable staff.

Their security measures meet or exceed all standards for local banks and financial institutions. This means that Sira is now and will continue to be one of the safest locations in Davis Square. As a result, they have had zero incidents for break-ins, zero incidents for diversion, and zero incidents for public nuisance.



Michelle stressed again that Sira Naturals is known by the Cannabis Control Commission as the gold standard for compliance and prevention of diversion. They use their dispensaries to train new inspectors on an example of what a well-run and compliant dispensary should look like.

They have a zero-tolerance policy for on premise consumption and their security guards have the right to refuse access to their dispensary. Security guards patrol the building perimeter regularly throughout the day to ensure there is no loitering. If anyone is caught consuming in or around the dispensary, they are placed on a permanent banned customer list and not allowed on the property moving forward.

As they are now, Sira will be appointment-only when they launch. Moreover, they have already successfully implemented appointment-only in Needham as well as Somerville.

They take their role as a secure location very seriously, which naturally includes their responsibility to prevent diversion to minors. Their seed to sale tracking system is 100% accurate and all product is accounted for daily. All customers enter through a secure vestibule after showing their ID's to the camera, are buzzed in, and have their ID's checked a second time by security. Product is kept behind a secure locked counter and stored in a limited access vault. They have educational literature that they provide to every single customer on the safe storage of cannabis and reinforce the dangers of distribution to and use by minors. They also strictly adhere to all CCC regulations around childproof packaging and labeling.

Furthermore, they have a Zero Tolerance Policy for the unauthorized removal of cannabis products by any employee, guest or vendor, resulting in immediate dismissal and notification of the proper law enforcement authorities. Their site is extremely secure, and prevention of diversion is their top priority every day.

Switching to accessibility of the site, they understand that their customers will primarily come from the surrounding neighborhood and will want to walk, ride or take any number of public transit options available in the area. That is why their 240 Elm Street location was specifically chosen for its transit-friendly location and the values that they share with the City of Somerville to minimize single occupancy vehicle trips.

Sira Naturals also engaged with Design Consultants, Inc., in Somerville to proactively complete a Transportation Impact analysis and a Transportation Access Plan. The results of the DCI studies demonstrate that adult use retail will have minimal impact on traffic and safety. DCI also found that zoning will require Sira to add some additional bicycle parking for employees and customers, and they are committed to doing that. This commitment matches the programs that they currently have in place to provide access to alternative transit modes by subsidizing MBTA Passes & Blue Bikes Subscriptions for all of their employees. They know that the City of Somerville shares these values and they're excited to be a part of a community that is planning a sustainable future for its residents and local businesses.

David Rosenberg then concluded the presentation portion of the meeting, summarizing why he believes Sira Naturals will continue to benefit the Somerville community in Davis Square:

“We are a safe, secure location, with a trusted team serving the neighborhood for over 3 years. We are going to continue our investment in the people and organizations of Somerville and participate in the community. We have a record of success and we know what we are doing, because we are the gold standard in Massachusetts. We are committed to hiring locally and putting Somerville residents to work in good, union jobs...I’m local, I care about these things personally, and I take our responsibilities very seriously.”

At this time, with 23 participants in attendance, the moderator reminded the audience that pursuant to local planning ordinances and state requirements including M.G.L. Chapter 94G and the Massachusetts Cannabis Control Commission’s regulations, this meeting was a public meeting and was being recorded. He then opened the public comment and question and answer portion of the meeting, giving instructions for how to participate. With no public officials or their representatives in the audience, and no written questions submitted prior to or during the presentation, the moderator called on individuals who had raised their hand to speak and give their comments.

The first comment came from Lincoln Taggart, Director of Operations and Planning for the Community Action Agency of Somerville (CAAS). Mr. Taggart wanted to thank Sira Naturals for being a fantastic partner in the community. In the time since Sira’s involvement and thanks to their contributions, CAAS was able to help 75 residents avoid eviction, 22 residents obtain safe and affordable housing, and 15 residents increase food security. Sira’s additional gift of \$10,000 to the Somerville CARES fund reached 43 residents affected by the pandemic “We know they will operate with a low profile and high degree of professionalism. This is all to say that Sira has been consistent and a strong community partner with a proven and sincere commitment to Somerville.”

The next comment came from Yvette Wilks, a 25 year resident of Somerville and active board member at Somerville media center. Yvette also produces the local hip hop festival in collaboration with Somerville Art Center. Yvette is really excited about collaborating with Sira Naturals and the impact it is going to bring to the Somerville community. “The mentorship program is something that we’ve been discussing in Somerville for over a year. And just to be able to bring this to the front line is just a wonderful opportunity. Once again I am fully supportive of Sira Naturals and their efforts to open an adult use store in Somerville.”

The next caller was RP Thompson who is the property manager for 212 Elm Street in Somerville. His questions was for David Rosenberg, “You mentioned there will be no lines outside of the building. I was wondering if you would be willing to commit to that in writing as

condition of the permit?” David said he would have to speak with counsel to see if that is possible but suggested that RP contact David and Michelle directly and to start a relationship and make sure that RP’s needs are met and that he is not adversely impacted. RP appreciated David’s offer, “That sounds like a good plan!” David and Michelle both provided their emails and phone numbers in the chat for participants to contact them directly. Dwan added that their community group is very active in Somerville and would be happy to be involved with David and Michelle to have regular follow ups.

Next to comment was Shaun Murphy, Vice President and Business Agent for UFCW Local 1445 who stated his full support for Sira Naturals. “They [Sira] have proven time and again they are a responsible business partner, bringing good union jobs, excellent health care, and the retirement plan. We fully support them and we wish you the best of luck.”

The next caller was Kennell Bromstein, a Business Agent at IBEW Local 103 who wanted to commend Sira for their commitment to having a diverse workforce, being fully committed to hiring union workers and the positive impact that has on the surrounding community.

Next was Jody Mendoza, a former Somerville resident who spoke in support of Sira Naturals. Ms. Mendoza, with Sira Natural’s help, was granted an economic empowerment certification and a provisional license in the City of Boston by the CCC. “Instead of looking at me as a competitor, they reached out as a helping hand and did everything they could to get me across the finish line to help me. And I think that goes long way in letting you know who Sira is as a company. The more I’ve gotten to know all of the key decision makers at Sira, the more that I can see that they really are truly committed to equity, inclusion, and they are just an overall a fantastic company. I admire them. I intend to emulate them.”

The last caller was Frank Shaw, a 68 year old Ipswich native who created the Frank’s Friends Initiative, a program that provides a 50% discount to the low income HIV/AIDS community. “Sira Naturals was the first medical marijuana dispensary to partner with the Frank’s Friends Initiative. I can’t thank them enough for their commitment to helping the HIV and AIDS patients in Boston, and the greater Boston community... Sira Naturals in Somerville provides those who qualify with 50% off the products grown by Sira Naturals. They also provide 20% off third-party or wholesale required products to those that qualify... I’m very happy to have Sira Naturals as one of my partners in the Frank Friend's Initiative.”

David Rosenberg thanked the audience for their attendance and participation and reminded them that he provided his and Michelle’s contact information in the chat section. He encouraged them to reach out to him, Michelle or Dwan with any questions.

In closing, the moderator offered, “Thank you to all who have listened, participated, offered comments or asked questions. This type of constructive community dialogue is vital to preserve, maintain and strengthen community character and we appreciate everyone who took



the time to join us. If you have any further questions, please don't hesitate to contact the applicant at community@siranaturals.org."

The meeting adjourned at 6:42 P.M.

Appendix A: Somerville Times Publication 1/13/21

Community Outreach Meeting

Notice is hereby given that a Virtual Community Outreach Meeting for a proposed Adult Use Marijuana Retail Establishment is scheduled for **Wednesday, January 27, 2021**. The meeting will begin at 6:00 PM and will include discussion about the proposed use in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 and 935 CMR 501.000 *et seq.*

The Virtual Community Outreach Meeting will be available at the following link and phone number:

Date: January 27, 2021

Time: 6:00 PM

Link: <https://zoom.us/j/99217714808>

iPhone one-tap: +13126266799,99217714808# or +16465588656,99217714808# or

Telephone: +1 312 626 6799

Webinar ID: 992 1771 4808

The proposed Adult Use Marijuana Retail Establishment for Sira Naturals is anticipated to be located at 240 Elm Street, Somerville, MA 01244. Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance of the January 27 meeting to community@siranaturals.org. Responses to these questions will be provided at the meeting.

A copy of this notice has been published in the Somerville Times at least fourteen (14) calendar days prior to the meeting as well as filed with the appropriate municipal entities, including the Town Clerk. This notice was also certified mailed at least seven (7) calendar days prior to the meeting to all abutters within 300 feet of the property line of the petitioner. You can view background information from the Mayor's Marijuana Advisory Committee (MAC) by visiting <https://www.somervillema.gov/departments/programs/adult-use-marijuana-establishments>. You can view project information and meeting materials by visiting: <http://Siracommunity.com/somerville>.

1/13/21 The Somerville Times

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1/13/21 The Somerville Times

Appendix B: Somerville Times Publication 1/20/21

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1/13/21, 1/20/21 The Somerville Times

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1/13/21, 1/20/21 The Somerville Times

Appendix C: City Clerk Filing

Community Outreach Meeting

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CITY CLERK'S OFFICE
SOMERVILLE, MA

2021 JAN 13 A 9:25



CITY OF SOMERVILLE

City Hall, 93 Highland Avenue, Somerville MA 02143

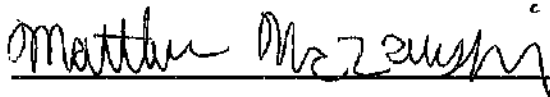
TO: The Harvest Collaborative; Sira Naturals; Liberty (Holistic Industries); Green Soul Organics; Revolutionary Clinics; Advesa

FROM: Acting Mayor Matthew McLaughlin

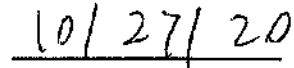
DATE: October 27, 2020

RE: CCC Virtual Community Outreach Meetings

I, Matthew McLaughlin, certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Somerville to approve an applicant's request to hold a virtual Community Outreach Meeting in accordance with the Cannabis Control Commission's April 27, 2020 Administrative Order Allowing Virtual Web-Based Community Outreach Meetings. This approval will last until the Cannabis Control Commission rescinds or amends this order, or until Mayor Curtatone's Declaration of Emergency is revoked, whichever occurs first.



Matthew McLaughlin, Acting Mayor



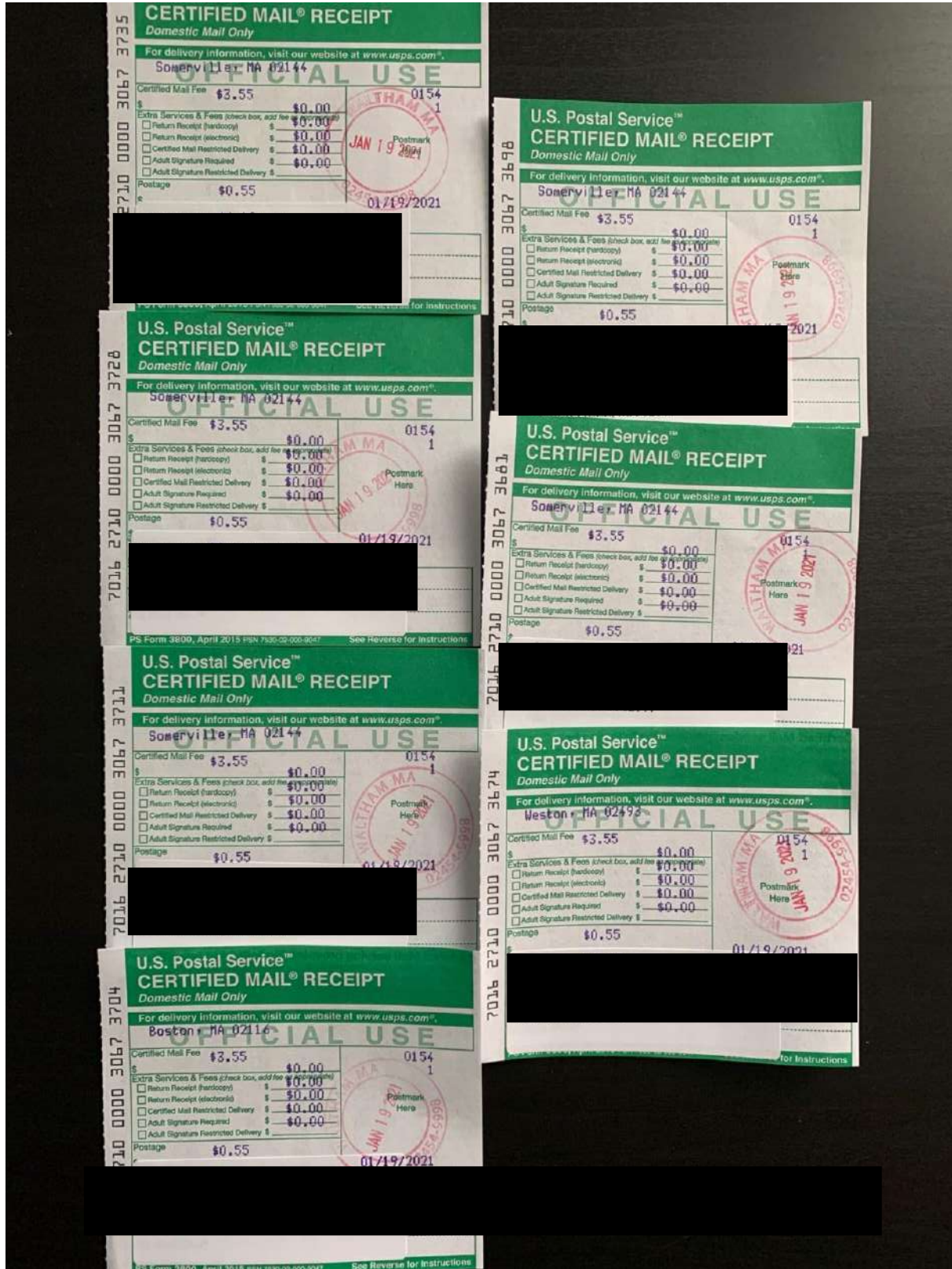
Date

Appendix D: Abutter Notification









Appendix E: Presentation Slide Deck

Somerville Community Meeting Adult Use Marijuana Retail - 240 Elm Street

THIS MEETING WILL BEGIN MOMENTARILY

PLEASE NOTE

Your connection/line will be on mute until the Q&A section at the end of the presentation

This meeting will be recorded and made available at siracommunity.com/somerville

We will respond to all questions at the end of the presentation

Somerville Community Meeting
Adult Use Marijuana Retail



Davis Square
240 Elm Street
Somerville, MA

January 27th, 2021



Agenda

1. Introductions, Meeting Guidelines & Information
2. Sira Naturals Presentation
3. Questions & Answers



3

How Will This Virtual Meeting Work?

How do I ask a question or make a comment?

- Raise your hand to indicate to the moderator



- A notification is sent - the moderator will let you know if/when your opportunity is ready
- From the telephone, press *9
- Use the Q+A – enter a question for all other attendees and panelists to see. The moderator will answer appropriate questions privately or publicly, in text or read aloud (depending on the question/comment)

4

How Will This Virtual Meeting Work?

When prompted, how do I mute/unmute myself?

- In the Zoom app, look for the radio microphone icon.
 - If there is a red slash mark through it, your line is muted.
 - Otherwise, your microphone line is on/on.
- Click the icon to toggle.
 - Also: Alt+A ('A' for audio) on a PC, and Shift+Command+A on a Mac.
- To mute/unmute from the telephone, press *6



5

We Would Like to Hear More From You...

Please Submit your Questions at the End of the Presentation using the Q&A Feature



Or Raise Your Hand if You Would Like to Speak!

6

Our Team

Experienced Local Professionals Focused on Community



David Rosenberg
Founder, President & Board Member



Lou Karger
Founder, Treasurer & Board Member



Dwan Packnett
VP Government Relations & Community Investment



Michelle Foley
Regional Dispensary Manager

7

Why Are We Here?

- In 2016, the residents of Somerville overwhelmingly voted for cannabis legalization 76% to 24% in Massachusetts (compared to the statewide vote of 54% to 46%)
- Sira Naturals is proposing to co-locate a licensed adult-use cannabis retail operation at our existing medical facility at 240 Elm Street in Davis Square
- Sira Naturals was awarded a Host Community Agreement by the Somerville Marijuana Advisory Committee in October
- This Community Meeting is for Sira to present its plans and answer your questions and concerns



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Who Are We?



Founded in 2013, Sira Naturals is one of the most respected vertically integrated cannabis companies and one of the largest cannabis industry employers in the state.

Leading the Way

- First Massachusetts cannabis company to provide workers with union protections and benefits (Under a Collective Bargaining Agreement with UFCW Local 1445)
- Only Massachusetts cannabis operator with zero deficiencies and zero incidences (Sira Naturals is often cited as “the gold standard” by state and local agencies)
- Established the first in the state Accelerator program to empower entrepreneurs and promote diversity and inclusion
- Co-founded CultivatED, the first in the nation jails-to-jobs program

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Experienced and Focused on Community

Expanding a Diverse Leadership Team & Community Investment

Strategy of Sira Community

- Voluntarily Unionized with UFCW Local 1445
 - First cannabis company to partner with UFCW to offer Living Wages, Competitive Benefits & Higher Ed Opportunities
- Creation and expansion of the state’s first Accelerator program to support Economic Empowerment entrepreneurs
- Over \$475,000/year directed to City of Somerville, Community Action Agency of Somerville (CAAS), and economic empowerment licensing



Sira Naturals Successful Compliance Record

- Zero incidents for Break-ins or Theft
- Zero incidents for Diversion
- Zero incidents for Public Nuisance

10



240 Elm Street

Sira's experience and state of the art design minimize any disruption to surrounding commercial areas

240 Elm Street – Operating Since 2017



Elm Street Entrance



Chester Street Entrance

- Safe and secure facility located at basement level
- Ideal location and purposefully constructed to be modest and inconspicuous
- Our exceptional retail team reduced average customer wait times from 15+ minutes to 3 - 5 minutes, with software and process enhancements, express lanes, and COVID19 safety protocols in place



Location

Proposed Facility
at 240 Elm Street
Complies with All
Applicable Zoning &
Buffer Zones

Radically Rethinking Community Engagement for Equity & Social Justice

Sira.Community is a three-phased equity driven Diversity & Inclusion and Employment program of community engagement, workforce development, and mentoring entrepreneurs in communities disproportionately affected by the Failed War on Drugs by providing information and opportunities that open a path toward a career in cannabis.

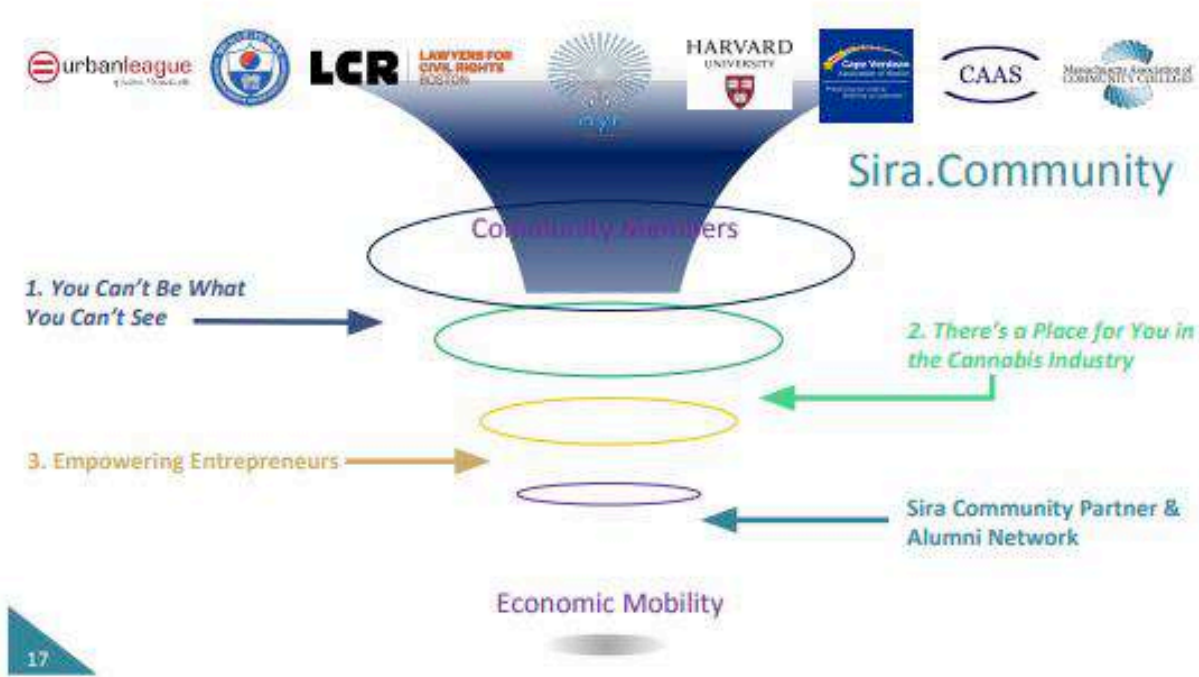


Sira.Community Goals

ENGAGE: Support job opportunities & local organizations

HIRE: Actively identify, recruit, and provide useful resources for employment and entrepreneurship

ACCELERATE: Provide coaching, workshops & business strategies to support entrepreneurial journeys at every stage



Community Investment: CAAS

Community Action Agency of Somerville

- December 2019: Funded Housing Search and Stabilization Advocate for \$51,000 over 3-years
- April 2020: \$10,000 contribution to the Somerville Cares Fund
- August 2020: Pledge of \$150,000 over 3-years



Employment Plan

Historic, Voluntary Partnership with UFCW Local 1445

- The first Cannabis Union Employer in Massachusetts
- Living wages, comprehensive benefits and career pathways
- Creation of first ever UFCW Cannabis Apprenticeship Program

Somerville First

- Implement local hiring preference for Somerville residents
- Commitment to reflect the demographics of the City of Somerville

The CultivatED Program

- Co-founders of the first in the nation cannabis jail-to-jobs program
- Innovative partnerships with Greater Boston Legal Services, Lawyers for Civil Rights, Roxbury Community College, MA Association of Community Colleges, Suffolk County Sheriff's Dept., and the Urban League of Eastern Massachusetts



Announcing CultivatED with Partner Organizations

Professional, Safe & Secure

Experienced Security and Operations Team

- Highly professional team with decades of experience. Our security measures meet or exceed the standards for local banks and financial institutions

Cannabis Control Commission Inspectors Train at Sira Naturals' Facilities

Focused on Keeping Neighborhoods Safe & Preserving Public Health

- Appointment Only Launch
- Zero Tolerance Policy & Banning Any Customer who Violates Policies from ALL Sira Stores

Sira Naturals Successful Compliance Record

- Zero incidents for Break-ins or Theft
- Zero incidents for Diversion
- Zero incidents for Public Nuisance

Prevention of Diversion Plan



Restricted Access to Sira Facilities

- Customers enter through a secure vestibule and may not enter the sales floor without first presenting valid identification. Security has sole discretion to refuse entry for any reason
- Entry restricted to properly identified individuals 21+ only and customers are greeted first by security. All ID's are scanned prior to entry to detect underage, fraudulent, or expired identification cards
- Sira security personnel will perform regular sweeps of the area around the facility to monitor the safety of the general public and prevent any diversion events from occurring

Preventing Diversion to Minors

- **Zero Tolerance Policy** for the removal or diversion of cannabis products resulting in immediate dismissal and notification of appropriate law enforcement authorities
- Sira adheres to all CCC regulations regarding childproof packaging and labeling

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Transportation



Centrally Located, Easily Accessible Local Retail

- Sira Naturals intentionally chose this location with the understanding that our neighborhood-based customers will walk, ride or utilize the numerous and convenient public transit options available in the area
- Located in one of Somerville's most accessible communities for walking, biking, and public transit, our 240 Elm Street location is one of the most transit-friendly cannabis operations in the City of Somerville

Proactive Transportation Study Completed

Transportation Options

Sira subsidizes MBTA Passes & Blue Bikes memberships for all employees

- Red Line (Davis Square)
- Bus Routes (77, 87, 88, 89, 90, 94, 96)
- Blue Bike Stations (Davis Sq T Station, Grove St at Community Path)

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Transportation Options

1/4 Mile Radius

- T
Subway
- 🚌
Bus Stop
- 🚲
Bicycle Parking
- P
Public Parking

23

Sira Naturals & Somerville

Experience & Excellence

- A safe and secure facility informed by Sira's extensive retail experience
- Purposefully designed to be inconspicuous and non-disruptive
- No lines or queuing outside of the facility, minimizing any disruption to surrounding area

Industry-Leading Community Investment

- You Can't Be What You Can't See
- There's a Place for You in the Cannabis Industry
- Sira Accelerator
- Sira.Community

24

Record of Success & Safety

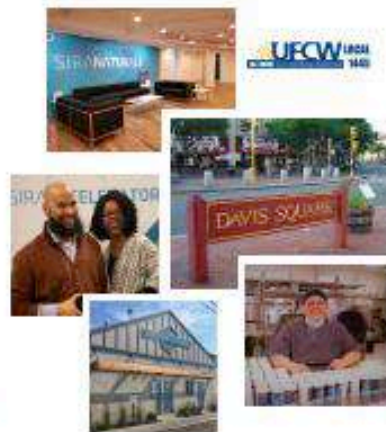
- CCC Inspectors train at Sira Naturals facilities
- Successful ongoing operations in Somerville, Milford & Needham with no violations
- 24/7 safety monitoring, strict enforcement of product safety and limited facility access

Local Hiring for Union Jobs

- Local jobs with living wages and competitive benefits with UFCW Local 1445
- Sira's priority is to hire locally and promote job openings via [Somerville First](#) program

Question & Answer

- 1) Questions Submitted in Advance
- 2) Questions Received via Email or Zoom
- 3) Open Question & Answer Section to All Community Meeting Participants
 - Review of Zoom Meeting Features



25

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- Raise your hand to indicate to the moderator



- A notification is sent - the moderator will let you know if/when your opportunity is ready
- From the telephone, press *9
- Use the **Q+A** – enter a question for all other attendees and panelists to see. The moderator will answer appropriate questions privately or publicly, in text or read aloud (depending on the question/comment)

26

How Will This Virtual Meeting Work?

When prompted, how do I mute/unmute myself?

- In the Zoom app, look for the radio microphone icon.
 - If there is a red slash mark through it, your line is muted.
 - Otherwise, your microphone line is on/on.
- Click the icon to toggle.
 - Also: Alt+A ('A' for audio) on a PC; and Shift+Command+A on a Mac.
- To mute/unmute from the telephone, press *6



We Would Like to Hear More From You...

Please Submit your Questions at the End of the Presentation using the Q&A Feature



Or Raise Your Hand if You Would Like to Speak!



Thank You Somerville!

Dwan Packnett
VP Gov't Relations &
Community Investment

Dpacknett@siranaturals.org
617.631.6838

Please visit our website:
sira.community



Appendix F: Meeting Transcript

ROUGH EDITED COPY

CSL
VIRTUAL MEETING
JANUARY 27, 2021

CART/CAPTIONING PROVIDED BY:
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* * * * *

This is being provided in a rough-draft format. Communication Access Realtime Translation (CART) is provided in order to facilitate communication accessibility and may not be a totally verbatim record of the proceedings

* * * * *

>> Good evening. Welcome to the community meeting hosted by Sira Naturals. We have 17 people on the line. There will be introductions, a presentation, and questions and answers. Next slide. In regard to how the meeting will work, the applicant will address any questions. Next because they were asked to register and speak in advance, they will be allowed to speak before opening the floor to others. If you didn't preregister and you would like to ask a question, use the raised hand icon on the bottom of your screen to let us know. Those of you on your phone can press star nine. A notification is sent to me, and I'll let you know when there's an opportunity to speak. You can use the Q & A icon. I'll read your question out loud and have our subject matter experts answer them. Next slide please. Once you are recognized to speak you can mute or unmute yourself with the icon in the Zoom app. If there's a red slash, your line is muted. You can click on the icon or use the Alt plus A on the PC and shift plus command on a mac. To unmute from a telephone, press star six. If you would like to submit a written question, you can click the Q & A or raise your hands if you would like to speak. Thank you to all for participating this evening and those who sent in questions or comments in advance. I know the outcome hooks forward to presenting plans and details addressing any questions and engaging in a respectful and constructive open community dialogue. Once again for your reference this presentation is also available online at Siracommunity.com. At this time there are 17 participants present in the meeting. I'll now turn the presentation over to David to begin the Sira Naturals presentation. David?

>> Thanks, Nolan. Good evening. Thank you for joining us today. I'm David Rosenberg. I'm the founder and former CEO of Prime Motor Group and also the

founder of Sira Naturals as well as board of directors. I'm please to introduced Dwan Packnett. And Michelle Foley. The regional dispensary manager. We understand that good companies don't exist without great relationships in communities. We want to create cooperation with Somerville. Why are we here? In 2016 the residents of Somerville overwhelmingly voted for cannabis legalization approving it 76-24% which is larger margin than the state average. Sira Naturals is proposing to use the existing facility to co-locate an adult license at same site. We secured 14.5 out of 15 points from the Somerville advisory committee in order to move the project forward at the licensing commission in the Somerville zoning board of appeals for a special permit. Next slide please. I'm very proud to be a part of Sira Naturals and the local root. I grew up on the north shore and lived in Boston my entire life. I'm excited to be part of the Sira Naturals. We have a leadership team that has been and will continue to focus on excellent relationships with our community and neighbors. We're the first cannabis company in Massachusetts to unionize by voluntarily partners with UFCW local 1445 to ensure the living wages, competitive benefits, and higher education communities for the work force. Next slide please. Since opening our doors in Somerville three years ago being a good neighborhood is a commitment that we're always taken serious hi. In partnership to the UFCW and co-founding cultivated, Sira borics hard to set an example in Massachusetts. You'll hear over and over we've set the gold standard for cannabis operations and the state cannabis control commission uses our locations to demonstrate what a good operation should look like. Next slide please. Our location is in the heart of Davis Square. As an experienced operator we understand our responsibility to the Somerville community. We must make the highest expectations e especially with this location and we've employed state of the art design principle to minimize disrupt and nuisances to surrounding commercial areas. Next slide please. Since opening the doors we've had many people that live and work in Davis Square ask where Sira Naturals is. As a team we wouldn't be more proud of this. Our company is doing an excellent job of keeping our promise to the neighborhood and city. Our approach is informed we our extensive experience and intentional design principles. Our facility is located at the basement level and purposefully constructed to be modest, conspicuous, safe, and secure. We have two entrances to the facility. Once in Elm Street and one in Chester Street. There will be no outdoor queuing of lines now or in the future. We've worked hard to make the operations a success over the past three years with regular security sweeps and the staff that minimizes any disruption to the area we believe we are the right operator to thoughtfully include adult use cannabis sales as part of the existing operations in Davis Square. Next slide please. We are proposing just two improves to the facility adding a few point of sale systems and operating our customer flow for master transaction times. With 4,900 square feet in the basement level we have a large floor space and hallways to queue customers safely and maintain social distancing. You can see the proposed layout, but it may change with the upcoming discussions with the CCC and the City of Somerville. All customers will enter through a secure entrance and form three lines. Medical patients will take the right to the designated medical and express medical pickup registers. Adult use customers will take an immediate left to the designated pickup registers where they will queue in the center of the space six feet apart if they don't have an express order.

Which is the line marked in blue here. Those customers without an express order will enter the space and proceed straight towards the back wall where there's ample room to queue six feet apart. We've highlighted the general entrance to demonstrate how customers begin and end their transactions. I would like to note the exterior of the building will not change. If you didn't know where Sira was before, it is going to be equally hard for you to know that we're still there. Next slide please. Just like our stories today, we are not going to be a disruption, a problem, or a nuisance to Davis Square. We plan to increase our staff to further streamline and with more adult use stores there's a positive impact on traffic and lines. When Neta opened up in Brookline in 2018 they were the first to open in the greater Boston area. We do not see the lines we saw two years ago when adult use was a novelty. As more stories, they are less of a detriment to consumer. The security monitors allow us visibility to all sidewalks around the dispensary to react quickly should any lines start to form. Which again we do not anticipate happening. We are a highly efficient team getting customers through quickly and ensuring there are no lines outside our facility because we fully understand that short of wait times correlate directly to the satisfaction of our guests and our neighbors. Next slide please. Finally our location rats 240 Elm Street conforms with all applicable zones and buffer zones placed in the city. Now I would like to turn it over to Dwan to talk about the employment plans and community and investment.

>> Thank you, David. Next slide please. Founded in 2013, Sira Naturals is one of the first seed to sale medical companies and has grown into one of the largest cannabis employers in the state with 230 employees. Although our growth has been thoughtful and with purpose, what matters most to me and why I'm so proud to be in the cannabis industry working with this amazing team is Sira commitment to diversity and inclusion as a core value driving our success. We created the first in the state accelerator program to support the economic empowerment entrepreneurs. We co-founded cultivator, the first in the nation jail to jobs cannabis industry work force training program. And in partnership with UFCW local 1445 we're creating a union apprenticeship program to build a diverse work force to fuel our future. This is why Sira Naturals is an important point of entry for people of color. Our secure living wage union jobs and local management offer employees like me a broad range of jobs and opportunities for advancement. Features unique to publicly traded companies like Sira Naturals and reason why IBM and Coca-Cola have played such an important role to people of color. For Sira Naturals the cannabis industry is an economic engine for enormous and equitable community engagement. Next slide please. Sira community is a three-phased equity driven, diversity and inclusion employment plan. The first step you can't be what you can't see is under remitted communities and community engagement. The first you can't be what you can't see informational seminar took place this past July with Somerville community corporation First Source. The second phase is there's a place for you in the cannabis industry. A work force development program and collaboration with UFCW local 1445. Finally we're delighted to empower entrepreneurs through our accelerator 2.0 program. Sira fellows all economic empowerment entrepreneurs receive hands on mentorship and training to open and sustain retail stores across the state while gaining access to the distribution know how in the networks. We are pleased to report that the cannabis control commission

granted three licenses to Sira fellows just this past summer. The first store the western front opened this past November in Chelsey, Massachusetts. Next slide please. However in order to recruit, hire, and retain a work force that reflects the values of Somerville, we must first invest in the future employee's neighborhoods. That's why we'll with contributing over \$475,000 in Somerville in fees, in-kind contribution, and cash investment in community organizations and activities. Much like our partnership with the community action agency of Somerville that we all know as CAAS. Next slide please. Sira Naturals has voluntarily unionized the work force becoming the first and only Massachusetts company to do so. The Somerville first resident will focus on hiring workers from groups typically under represented in the cannabis industry. Those from disproportionately impacted communities by the failed war on drugs, people of color, women, and veterans. Most critical to our employment plan is ensuring that a record is not a barrier to the cannabis industry or Sira Naturals. We cultivated the first jail to jobs program for the cannabis industry. We make an annual contribution of \$25,000 working alongside our institutional partners Roxbury Community College, at the Urban League, and Locals for Civil Rights. Community defines who we are as a company. We consider ourselves deeply connected members of the Somerville community. You see us often whether through the discreetly located store for the past three years, or our collaboration with at the medical marijuana community association lead by the health and human services department where we collectively with other medical marijuana operators work with the city to create meaningful prevention, diversion, and mental health programs for children and young adults. Or our delivery of personal, protective equipment as a huge thank you to the City of Somerville and Nurse Harris for her brilliant work comforting and counseling our employees during the initial outbreak of COVID a year ago. And Charlotte Lee's prompt respond expediting the city's review of new CCC recommended COVID home delivery and curb side service protocols. They are from the past. We have no intention of stopping here. We're working hard with the community leaders with the ground-breaking awareness and empower testimony program. We look forward to a future working closely with the Somerville community. Now I would like to introduce my colleague, Michelle Foley.

>> Thank you. Sira's retail workers are added and come rised of industry professionals, high volume retail experts, and friendly and knowledgeable staff. Our security measures meet or exceed all standards for local banks and financial institutions. This means that Sira is now and will continue to one of the safest locations in Davis Square. As a result of everything that I just spoke to and Dwan and David, we had zero incidents of break-ins or diversions or public incidents. They are known for the gold standard for compliance and prevention of diversion. They use our dispensaries to train new inspections on what a well run dispensary should look like. We have zero tolerance for on-premise consumption. If anyone is caught consuming in or around the building, they will be placed on the permanent ban list moving forward. We will be appointment only when we launch. This is not new to us. We've been operating employment only for almost a year now since COVID hit in both locations. We take our role as a secure location very seriously which naturally includes our responsibility to prevent diversion to minors. Our mandated state to sale tracking system is 100% accurate and all product is accounted for daily. Product in the store is

kept behind the secure, locked counter. We have educational literature that we provide to every customer and patient on the safe storage of cannabis and reinforce the dangers of contribution to and use by minors. All customers enter through a secure vestibule after showing their IDs to the camera. They are buzzed in and have the IDs checked a second time by security. We have a zero tolerance policy for the unauthorized removal of any products by any employee, guest, or vendor. We also adhere strictly to all CCC regulations around child proof packages and labels.

Prevention of diversion is our top priority every day. Next slide please. We understand that our customers will primarily come from the surrounding neighborhood and will want to walk, ride, or take any number of public transit options available in the area. This is why the 240 Elm Street was chosen for the location and the values that we share to minimize single occupancy trips. They proactively completed the transportation impact analysis and transportation access plan. Very briefly the results of the DCI studies demonstrate that adult use detail will have minimal impact on traffic and safety. DCI also found that zoning will require Sira to add some additional bike parking for employees and customers. We're committed to doing that. This commitment matches the program that we have at Sira to provide access to alternative transit mode by subsidizing the passes and subscriptions for all of our employees. We know the City of Somerville shares the values. We're excited to be part of the community that's planning a sustainable future for the residents and local businesses. Next slide please. We're a short walk to the red line. Over half a dozen bus routes and two blue bike stations. Sira subsidizes the MBTA and membership for all of the employees. We'll be taking full advantage of the public transit options the area offers for the union employees. I would like to turn it back over to David for the final slide of the presentation.

>> Thanks, Michelle. In summary, there are four strong reasons why we believe that we can continue to benefit this Somerville community in Davis Square. 1) we're a safe, secure location with a trusted team serving the neighborhood for over three years. 2) we're going to continue our investment in the people and organizations of Somerville and participate in the community. 3) We have a record of success. We know what we are doing, because we're the gold standard in Massachusetts. And 4) We're committing to hiring locally and putting Somerville residents to work in good union jobs. I'm local. I care about these things personally. Thank you so much for having us tonight. Nolan, back over to you.

>> Thank you, David. There are now 23 participants on the call. Again pursuant to the public code I'll recognize those who preregistered to speak. We did not receive any questions prior to the meeting via e-mail.

If you didn't preregister but you would like to ask a question, use the raise hand icon at the bottom of your screen to let us know. Those of you on your phone can press star nine. A notification is sent to us and we'll let you know when there's an opportunity to speak. You can use the Q & A icon for all other panelists to see. I will read your question out loud and have our subject matter experts answer them. Next slide please. Once you are recognized to speak you can mute or unmute yourself with the radio microphone icon in the Zoom map. If there's a red slash mark through it, your line is muted. You can click on the icon or use Alt+A on the PC and shift command A on the Mac. To mute or unmute from the telephone, press star six. To submit the written

question you can use the Q & A icon or click raise hand if you would like to speak. When submitting the question or when you are recognized to speak, please let us know your name and address. At this time I would like to ask if there are any public officials or the representatives on the call. If so, please identify yourself and we'll take you out of turn. I don't see any. We'll go to people who have raised their hands.

>> And Mr. Lincoln, we're unmuting you.

>> Thank you. Can you hear me now?

>> We can.

>> Wonderful. Good evening, everyone. I'm Lincoln Taggart. I'm the acting executive director at the community agency in Somerville. I don't want to take too much time. I want to say thank you to Sira for being a fantastic partnership with CAAS. We needed a secure a large gap in funding. They invested \$51,000 in three years. In the time that has elapsed since, the funding has directly resulted in 75 residents avoiding eviction, 22 residents obtaining safe and affordable housing, 15 residents increase food security. Sira's additional gift of \$10,000 in Somerville CAR ES fund reached 43 residents affected by the pandemic. It will sustain vital antipoverty work for years to come. We know they will operate with a low profile and high degree of professionalism. This is all to say that Sira has been consistent in the strong community partner with the proven and sincere commitment to Somerville. Thank you for giving me some time this evening to express my support.

>> Thank you, Lincoln. We'll go down the line here. Next is Lisa Wilks Ball.

>> We have to move Lisa to the panelist. Because of her version of Zoom. She's able to speak now.

>> Awesome. Hello. I'm Yvette Wilks. I moved to Somerville over 25 years ago. My first home was in Westwood Road. What an introduction to Somerville. I've been an active member and board member at Somerville media center and I also produce the local hip hop festival and collaboration with Somerville Art Center. For the last six years. And so I've raised -- you know, twins, and they went to public schools in Somerville. I'm really excited about collaborating with Sira Naturals and the impact it is going to bring to our community. With the mentorship program it ties directly into what Sira Naturals is promoting about the individuals need to see things before they can believe it. With the mentorship program we want to work with various guest speakers who allow the participants to be able to ask questions about their career paths. We also will be working with David Harris at the Harvard Law School who have a program called Just Flicks which will teach them on how to use their cell phones to tell their stories. We'll find ways to be able to place those stories out there whether with public art or TV or radio shows. I'm just very excited about this collaboration and the mentorship program is something that we've been discussing in Somerville for over a year. And just to be able to bring this to the front line is just a wonderful opportunity and once again I fully support -- fully supportive of Sira Naturals and their efforts to open an adult use store in Somerville.

>> Thank you for those comments, Yvette. If anyone from the team would like to jump in and address any of these comments, feel free to stop me. Otherwise I'll move down the list. Next is RP Thompson.

>> Hello. I'm RP Thompson. I'm Property manager for 212 Elm Street. David earlier you mentioned there will be no lines outside of the building. I was wondering if you would be willing to commit to that in writing as condition of the permit?

>> I'll have to talk to counsel and see if it is evening possible to do that. What I would suggest is a first step is that we meet with you and I think you should meet with Michelle on site. I don't believe there have been any parking issues so far. But I think what would be a good idea is for us to meet and at least start a relationship. So we can make sure that your needs are met and that you are not adversely impacted.

>> That sounds like a good man. I appreciate you making that offer. How -- what would be the best way to reach out to you?

>> Michelle, do you want to put on chat? I'll put my contact info and Michelle, maybe you can put your contact info in chat as well.

>> That's great. Thank you.

>> Absolutely. So I think -- sorry, let me figure out how to do that. I think I message it to all panelist.

>> You can do it to panelist and attendees.

>> And David, if I could add for Mr. Thompson the community group is also very active in Somerville. We would be happy to be involved with David and Michelle and to have regular follow ups and we're just there. And to work with you as well.

>> Great idea, Dwan.

>> Yeah. We want to be included to.

>> I agree.

Thank you.

>> Thank you. And just for my notes did you say 212 Elm?

>> Correct.

>> Thank you.

Okay. Moving down the list next would be Shawn Murphy.

>> Can you guys hear me okay?

>> Yes.

>> Hi. I'm Shaun Murphy. I'm the vice president and business agent for UFCW local 1445. I fully support Sira Naturals. They have proven time and again they are a respond business partner bringing good union jobs, excellent health care, and the retirement plan. We fully support them. We wish you the best of luck. Thank you.

>> Thank you, Shaun. Next if I butcher these names, please correct me. Kenell.

>> Can you hear me? Good evening. I'm Kenel I Broom Stein. I would like to add on to the work that local work being done and in the importance of bringing up the people in the community. With the support and the love Sira Naturals allowing and being fully committed to hiring union workers for the UFCW 1445 which allows the community from Somerville to allow and rise up into the middle class and aligns with what IB local does for the community. We'll have members as well as UFCW there. I want to go on the record to fully support Sira Naturals new location.

>> Thank you for those comment. Next we have Jodie Mendoza.

>> Hello.

>> We can hear up.

>> My name is Jody Mendoza. I'm a former Somerville resident. I would like to speak in support of Sira Natural. My involvement began a while ago. I have an economic empowerment certification and visual license that's been granted to me in Boston by the cannabis control commission. One of the reasons I was able to get that is the help that I got from Sira. It is extremely difficult process to go through as everyone knows it is very highly regulated and challenging. And the certification I got allowed me to get an expedited review of my application. But successfully completing the process is separate challenge. It is one that there's no help with. There's no -- this is a new industry. There's no demonstrate on how to do it. It was a great surprise to me to find out that a company that I would anticipate would look at me as a competitor since I'm trying to get a license in the recreational cannabis license. Instead of looking at me as a competitor, they reached out a helping hand and did everything they could to get me across the finish line to help me. And I think that goes long way in letting you know who Sira is as a company. The more they've gotten to know all of the key decision makers at Sira the more that I can see that they really are truly committed to equity, inclusion, and they are just overall a fantastic company. I admire them. I intend to emulate them. I definitely in support. Thank you.

>> Thank you for those comments. Now we have Frank Shaw.

>> Hello. I'm Frank Shaw. I'm 68 years old. I live in Ipswich. I created the Frank Friend's Initiative. It is only available in the medical marijuana program. I would like to take a moment to speak about the Frank Friend's Initiative. It is a program that provides 50% discount to the low income, HIV, AIDS community. Sira Naturals was the first medical marijuana dispensary to partner with the Frank's Friend's Initiative. I can't thank them enough for their commitment to helping the HIV and AIDS patients in Boston, greater Boston community. Because medical marijuana is federally illegal, the cost is not covered by health insurance which forces HIV and AIDS patients to pay out of pocket for their medicine. I started the friend's initiative to help HIV and AIDS patients that are struggling with financial hardship. If qualified for the Frank's Friend's Initiative, they must bring their HIV/AIDS documentation from a physician. The patient must have proof also of low income status to qualify. If you are a recipient of Mass Help can be supplement tag security income, SNAP benefits, or have a federal tax return that shows the household income under 300% of the federal poverty guidelines, you qualify as low income. Sira Naturals in Somerville provides those who qualify with 50% off the products grown by Sira Naturals. They provide 20% off third-party or wholesale required products to those that qualify. Frank Friend's 50% discount is also available for qualifying patients at participating doctor's offices, including Med Royal Help and Wellness in Somerville. I appreciate the opportunity to speak this evening. And I'm very happy to share this information with you tonight. I'm very happy to have Sira Naturals as one of my partners in the Frank Friend's Initiative. Thank you.

>> Thank you, Frank. At this time we don't have any more hands raised. I'm not sure if I can it -- looking at the Q & A. If there's anything in the Q & A, please feel free to read those.

I'm not seeing any. Right now. So unless anyone from at the team would like to comment or address any comments here tonight, please feel free. Otherwise we'll go ahead and adjourn.

>> Thanks, Nolan. I want to thank everyone for coming tonight. And to remind everyone that Michelle and I put our contact information on the chat. So you can reach out to us for any questions or comments. We'll certainly involve Dwan as well. Thank you. Have a good night, everyone.

>> Thank you. Thank you, David. Thank you all who have listened and participated and offered comments or ask questions. This type of constructive community dialogue is vital to preserve and maintain and strengthen the community character. We appreciate everyone that took the time to join us tonight. If you have any further questions, don't hesitate to join us at Sira Naturals web site.

>> I want to say my contact information is on the screen now.

>> Perfect. Thank you.

>> Thank you. Bye. Thank you.



Plan for Positive Impact

INTENT

Cannabis prohibition has disproportionately impacted certain communities in Massachusetts. As the Commonwealth begins to embrace the adult-use cannabis industry in earnest, Sira Naturals, Inc., (“Sira”) recognizes that it has a responsibility to contribute to areas of disproportionate impact and help disproportionately harmed by marijuana prohibition. Sira will focus its time and resources on Chelsea which has been identified by the Commission as an area of disproportionate impact.

PURPOSE

The purpose of this document is to summarize Sira’s plan to ensure its business creates positive and lasting impacts on the communities in which it will be involved.

Sira is committed to fostering positive relationships within the community and endeavoring to identify ways in which to give back. Sira seeks to utilize its resources, including time, talent and monies, to provide assistance to those who may be underserved and/or in need. We plan to achieve these goals through volunteer time and community engagement.

INITIATIVES AND METRICS

Sira aims to implement the following initiatives to assist those communities that have been disproportionately impacted and will adhere to the requirements set forth in 935 CMR500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

Proposed Initiative: Sira will make a minimum annual financial contribution of at least \$5,000 to the CultivatED program to help promote participation in the cannabis industry by those who were disproportionately harmed by marijuana prohibition. CultivatED is a jails-to-jobs cannabis program that focuses on issues such as expungement, education and employment for those harmed populations. The mission of CultivatED is to empower, educate, and employ individuals from areas of disproportionate impact, as identified by the Massachusetts Cannabis Control Commission, who have been harmed by the failed War on Drugs. The program shall provide to its fellows: Responsible Vendor Training, as well as an “Introduction to Cannabis and the Law” course at Roxbury Community College, while receiving workforce development training through the Urban League of Eastern Massachusetts. Sira will provide money to CultivatED to support its mission and goals but will not offer any of its own programming through the CultivatED

program. Attached, please find a letter from CultivatED acknowledging acceptance of funds from cannabis license holders.

Goal: Sira will make an annual financial contribution to the CultivatED program which will in turn support the mission of empowering, educating, and employing individuals from areas of disproportionate impact, as identified by the Massachusetts Cannabis Control Commission.

Metrics: Sira will maintain a record of its annual donations to the CultivatED program. Sira will keep records of feedback that are received relative to the impact of the company's contributions, if any. This will in turn help us make decisions about adjustments that need to be made in the future.

Proposed Initiative: Sira will commit to provide employees with a minimum of 8 hours per year paid time to participate in a neighborhood clean-up initiative that serves identified areas of disproportionate impact. Sira will focus their clean-ups in Chelsea. Employees will be notified of these clean-up days through an employee correspondence or public posting around the establishment.

Goal: Sira is committed to serving communities that have been disproportionately impacted by serving individuals and organization through the contribution of employee volunteer time courtesy of the company with a goal of donating 8 hours per employee per year. Sira will have a goal of 75% participation in the Chelsea neighborhood clean-up program by its employees each calendar year.

Metrics: Sira will maintain records of each employee who participates in the neighborhood clean-up program and the number of hours contributed by each employee. These clean-ups will begin once Sira obtains its Provisional License taking place within the first year of its provisional license. Sira will then solicit feedback from participating employees to learn about their experiences and determine whether adjustments should be made in the future with regards to this program. These metrics will be outlined in a report that will be completed 60 days prior to the company's annual license renewal (one year from provisional licensure, and each year thereafter) to the Cannabis Control Commission. Sira will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

CONCLUSION

Sira will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Plan for Positive Impact. Any actions taken, or programs instituted by Sira will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws. Progress and/or success of this plan will be documented one year from provisional licensure and each year thereafter.



MASS CultivatED

February 24, 2020

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

RE: Acceptance of Cannabis Funds

Dear Cannabis Control Commission:

It is with great pleasure that we inform you that we will be graciously accepting contributions from licensed Massachusetts cannabis companies in order to assist in funding our program, CultivatED.

CultivatED is a first in the nation jails to jobs cannabis program that focuses on issues such as expungement, education and employment for those who have been affected by the prohibition of cannabis in the Commonwealth. We are an innovative public-private partnership providing our fellows with a robust co-op education program, legal services, workforce preparedness training, and cannabis externships with livable wages and benefits. We work closely with organizations such as Greater Boston Legal Services, Roxbury Community College and the Urban League of Eastern Massachusetts to achieve our program goals.

We appreciate the opportunity to allow Massachusetts licensed cannabis companies to participate through their contributions. Please do not hesitate to contact us should you have any additional questions.

Sincerely,

A handwritten signature in black ink that reads "Ryan Dominguez". The signature is written in a cursive style and is positioned above a horizontal line.

Ryan Dominguez

AMENDED & RESTATED BY-LAWS

OF

SIRA NATURALS, INC.
(a Massachusetts corporation)

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ARTICLE I
SHAREHOLDERS

Section 1. Annual Meeting. The Corporation shall hold an annual meeting of shareholders at a time fixed by the Directors. The purposes for which the annual meeting is to be held, in addition to those prescribed by the Articles of Organization, if any, shall be for electing directors and for such other purposes as shall be specified in the notice for the meeting, and only business within such purposes may be conducted at the meeting. In the event an annual meeting is not held at the time fixed in accordance with these Amended and Restated By-Laws (these “**By-Laws**”) or the time for an annual meeting is not fixed in accordance with these By-Laws to be held within thirteen (13) months after the last annual meeting was held, the Corporation may designate a special meeting held thereafter as a special meeting in lieu of the annual meeting, and the meeting shall have all of the effect of an annual meeting.

Section 2. Special Meetings. Special meetings of the shareholders: (a) shall be called by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by another officer, if the holders of at least ten percent (10%), or such lesser percentage as the Articles of Organization permit, of all the votes entitled to be cast on any issue to be considered at the proposed special meeting sign, date, and deliver to the Secretary one or more written demands for the meeting describing the purpose for which it is to be held; and (b) may be called by the Chief Executive Officer, the President or by the Directors. Only business within the purpose or purposes described in the meeting notice may be conducted at a special shareholders’ meeting.

Section 3. Place of Meetings. All meetings of shareholders shall be held at the principal office of the Corporation unless a different place is specified in the notice of the meeting or the meeting is held solely by means of remote communication in accordance with Section 11 of this Article I.

Section 4. Requirement of Notice. A written notice of the date, time, and place of each annual and special shareholders’ meeting describing the purposes of the meeting shall be given to shareholders entitled to vote at the meeting (and, to the extent required by law or the Articles of Organization, to shareholders not entitled to vote at the meeting) no fewer than seven (7) nor more than sixty (60) calendar days before the meeting date. If an annual or special meeting of shareholders is adjourned to a different date, time or place, notice need not be given of the new date, time or place if the new date, time or place, if any, is announced at the meeting before adjournment. If a new record date for the adjourned meeting is fixed, however, notice of the adjourned meeting shall be given under this Section to persons who are shareholders as of the new record date. All notices to shareholders shall conform to the requirements of Article III.

Section 5. Waiver of Notice. A shareholder may waive any notice required by law, the Articles of Organization, or these By-Laws before or after the date and time stated in the notice. The waiver shall be in writing, be signed by the shareholder entitled to the notice, and be delivered to the Corporation for inclusion with the records of the meeting. A shareholder’s attendance at a meeting: (a) waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting; and (b) waives objection to consideration of a particular

matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

Section 6. Quorum.

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

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

Section 7. Voting and Proxies. Unless the Articles of Organization provide otherwise, each outstanding share, regardless of class, is entitled to one vote on each matter voted on at a shareholders' meeting. A shareholder may vote his or her shares: (a) in person; (b) by appointing a proxy in writing to vote or otherwise act for him or her; or (c) by appointing his or her attorney-in-fact in writing. An appointment of a proxy or attorney-in-fact is effective when received by the Secretary or other officer or agent authorized to tabulate votes. Unless otherwise provided in the form appointing the proxy or attorney-in-fact, a proxy or attorney-in-fact is valid for a period of eleven (11) months from the date the shareholder signed the form or, if it is undated, from the date of its receipt by the officer or agent. An appointment of a proxy is revocable by the shareholder unless the appointment form conspicuously states that it is irrevocable and the appointment is coupled with an interest, as defined in the MBCA. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy or attorney-in-fact shall not affect the right of the Corporation to accept the proxy's or attorney-in-fact's authority. A transferee for value of shares subject to an irrevocable proxy or attorney-in-fact may revoke the appointment if he or she did not know of its existence when he or she acquired the shares and the existence of the irrevocable appointment was not noted conspicuously on the certificate representing the shares or on the information statement for shares without certificates. Subject to the provisions of Section 7.24 of the MBCA and to any express limitation on the proxy's or the attorney-in-fact's authority appearing on the face of the appointment form, the Corporation is entitled to accept the proxy's vote or other action as that of the shareholder making the appointment.

Section 8. Action at Meeting. If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, is taken by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater number of affirmative votes is required by law, or the Articles of Organization, these By-Laws or a

resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups. Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

Section 9. Action without Meeting by Written Consent.

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

(b) If action is to be taken pursuant to the consent of voting shareholders without a meeting, the Corporation, at least seven (7) days before the action pursuant to the consent is taken, shall give notice, which complies in form with the requirements of Article III, of the action: (i) to nonvoting shareholders in any case where such notice would be required by law if the action were to be taken pursuant to a vote by voting shareholders at a meeting; and (ii) if the action is to be taken pursuant to the consent of less than all the shareholders entitled to vote on the matter, to all shareholders entitled to vote who did not consent to the action. The notice shall contain, or be accompanied by, the same material that would have been required by law to be sent to shareholders in or with the notice of a meeting at which the action would have been submitted to the shareholders for approval.

Section 10. Record Date. The Directors may fix the record date in order to determine the shareholders entitled to notice of a shareholders' meeting, to demand a special meeting, to vote, or to take any other action. If a record date for a specific action is not fixed by the Board of Directors, and is not supplied by law, the record date shall be the close of business either on the day before the first notice is sent to shareholders, or, if no notice is sent, on the day before the meeting or, in the case of action without a meeting by written consent, the date the first shareholder signs the consent. A record date fixed under this Section may not be more than seventy (70) calendar days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date, which it shall do if the meeting is adjourned to a date more than one hundred twenty (120) calendar days after the date fixed for the original meeting.

Section 11. Meetings by Remote Communications. Unless otherwise provided in the Articles of Organization, if authorized by the Directors, any annual or special meeting of shareholders: (a) need not be held at any place, but may instead be held solely by means of remote communication; and (b) shall be subject to such guidelines and procedures as the Board

of Directors may adopt. Shareholders, proxyholders and attorneys-in-fact not physically present at a meeting of shareholders may, by means of remote communications: (i) participate in a meeting of shareholders; and (ii) be deemed present in person and vote at a meeting of shareholders whether such meeting is to be held at a designated place or solely by means of remote communication, provided that: (x) the Corporation shall implement reasonable measures to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder, proxyholder or attorney-in-fact; (y) the Corporation shall implement reasonable measures to provide such shareholders, proxyholders and attorneys-in-fact a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings; and (z) if any shareholder, proxyholder or attorney-in-fact votes or takes other action at the meeting by means of remote communication, a record of such vote or other action shall be maintained by the Corporation.

Section 12. Form of Shareholder Action.

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

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

Section 13. Shareholders List for Meeting.

(a) After fixing a record date for a shareholders' meeting, the Corporation shall prepare an alphabetical list of the names of all its shareholders who are entitled to notice of the meeting. The list shall be arranged by voting group, and within each voting group by class or series of shares, and show the address of and number of shares held by each shareholder, but need not include an electronic mail address or other electronic contact information for any shareholder.

(b) The shareholders list shall be available for inspection by any shareholder, beginning two (2) business days after notice is given of the meeting for which the list was

prepared and continuing through the meeting: (i) at the Corporation's principal office or at a place identified in the meeting notice in the city where the meeting will be held; or (ii) on a reasonably accessible electronic network, provided that the information required to gain access to such list is provided with the notice of the meeting. If the meeting is to be held solely by means of remote communication, the list shall be made available on an electronic network.

(c) A shareholder, his or her agent, or attorney is entitled on written demand to inspect and, subject to the requirements of Section 2(c) of Article VI of these By-Laws, to copy the list, during regular business hours and at his or her expense, during the period it is available for inspection.

(d) The Corporation shall make the shareholders list available at the meeting, and any shareholder or his or her agent or attorney is entitled to inspect the list at any time during the meeting or any adjournment.

ARTICLE II

DIRECTORS

Section 1. Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, its Board of Directors.

Section 2. Number and Election. The Board of Directors shall consist of one or more individuals, with the number fixed by the shareholders at the annual meeting or by the Board of Directors. The number of directors constituting the Board of Directors shall initially be fixed at five (5) until the first annual meeting of stockholders. Except as otherwise provided in these By-Laws or the Articles of Organization, the Directors shall be elected by the shareholders at the annual meeting.

Section 3. Vacancies. If a vacancy occurs on the Board of Directors, including a vacancy resulting from an increase in the number of Directors: (a) the shareholders may fill the vacancy; (b) the Board of Directors may fill the vacancy; or (c) if the Directors remaining in office constitute fewer than a quorum of the Board, they may fill the vacancy by the affirmative vote of a majority of all the Directors remaining in office. A vacancy that will occur at a specific later date may be filled before the vacancy occurs, but the new Director may not take office until the vacancy occurs.

Section 4. Chairman of the Board and Vice-Chairman of the Board. The Board of Directors may appoint: (a) a Chairman of the Board; and (b) a Vice-Chairman of the Board. The Chairman of the Board, if any, shall preside at all meetings of the Board of Directors and of the stockholders at which such person shall be present. If the Board of Directors appoints a Chairman of the Board, he or she shall also perform such duties and possess such powers as are assigned by the Board of Directors and as may be provided by law. If the Board of Directors appoints a Vice-Chairman of the Board, he or she shall, in the absence or disability of the Chairman of the Board, perform the duties and exercise the powers of the Chairman of the Board

and shall perform such other duties and possess such other powers as may from time to time be vested by the Board of Directors.

Section 5. Change in Size of the Board of Directors. The number of Directors may be fixed or changed from time to time by the shareholders or the Board of Directors, and the Board of Directors may increase or decrease the number of Directors last approved by the shareholders.

Section 6. Tenure. The terms of all Directors shall expire at the next annual shareholders' meeting following their election. A decrease in the number of Directors does not shorten an incumbent Director's term. The term of a Director elected to fill a vacancy shall expire at the next shareholders' meeting at which Directors are elected. Despite the expiration of a Director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of Directors.

Section 7. Resignation. A Director may resign at any time by delivering written notice of resignation to the Board of Directors, the Chairman of the Board, or to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date.

Section 8. Removal. Except as otherwise provided in any written agreement to which the Corporation is a party: (a) the shareholders may remove one or more Directors with or without cause; (b) a Director may be removed for cause by the Directors by vote of a majority of the Directors then in office; and (c) a Director may be removed by the shareholders or the Directors only at a meeting called for the purpose of removing him or her, and the meeting notice must state that the purpose, or one of the purposes, of the meeting is removal of the Director.

Section 9. Regular Meetings. Regular meetings of the Board of Directors may be held at such times and places as shall from time to time be fixed by the Board of Directors without notice of the date, time, place or purpose of the meeting.

Section 10. Special Meetings. Special meetings of the Board of Directors may be called by the President, by the Secretary, by any two Directors, or by one Director in the event that there is only one Director.

Section 11. Notice. Special meetings of the Board must be preceded by at least 24 hours' notice of the date, time and place of the meeting. The notice need not describe the purpose of the special meeting. All notices to directors shall conform to the requirements of Article III.

Section 12. Waiver of Notice. A Director may waive any notice before or after the date and time of the meeting. The waiver shall be in writing, signed by the Director entitled to the notice, or in the form of an electronic transmission by the Director to the Corporation, and filed with the minutes or corporate records. A Director's attendance at or participation in a meeting waives any required notice to him or her of the meeting unless the Director at the beginning of the meeting, or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

Section 13. Quorum. A quorum of the Board of Directors consists of a majority of the Directors then in office, provided always that any number of Directors (whether one or more and

whether or not constituting a quorum) constituting a majority of Directors present at any meeting or at any adjourned meeting may make any reasonable adjournment thereof.

Section 14. Action at Meeting. If a quorum is present when a vote is taken, the affirmative vote of a majority of Directors present is the act of the Board of Directors. A Director who is present at a meeting of the Board of Directors or a committee of the Board of Directors when corporate action is taken is considered to have assented to the action taken unless: (a) he or she objects at the beginning of the meeting, or promptly upon his or her arrival, to holding it or transacting business at the meeting; (b) his or her dissent or abstention from the action taken is entered in the minutes of the meeting; or (c) he or she delivers written notice of his or her dissent or abstention to the presiding officer of the meeting before its adjournment or to the Corporation immediately after adjournment of the meeting. The right of dissent or abstention is not available to a Director who votes in favor of the action taken.

Section 15. Action Without Meeting. Any action required or permitted to be taken by the Directors may be taken without a meeting if the action is taken by the unanimous consent of the members of the Board of Directors. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each Director, or delivered to the Corporation by electronic transmission, to the address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of Directors, and included in the minutes or filed with the corporate records reflecting the action taken. Action taken under this Section is effective when the last Director signs or delivers the consent, unless the consent specifies a different effective date. A consent signed or delivered under this Section has the effect of a meeting vote and may be described as such in any document.

Section 16. Meetings Not in Person. The Board of Directors may permit any or all Directors to participate in a regular or special meeting by, or conduct the meeting through the use of, any means of communication by which all Directors participating may simultaneously hear each other during the meeting. A Director participating in a meeting by this means is considered to be present in person at the meeting.

Section 17. Committees. The Board of Directors may create one or more committees and appoint members of the Board of Directors to serve on them. Each committee may have one or more members, who serve at the pleasure of the Board of Directors. The creation of a committee and appointment of members to it must be approved by a majority of all the Directors in office when the action is taken. Article III and Sections 11 through 16 of this Article shall apply to committees and their members. To the extent specified by the Board of Directors, each committee may exercise the authority of the Board of Directors. A committee may not, however: (a) authorize distributions; (b) approve or propose to shareholders action that the MBCA requires be approved by shareholders; (c) change the number of the Board of Directors, remove Directors from office or fill vacancies on the Board of Directors; (d) amend the Articles of Organization; (e) adopt, amend or repeal By-Laws; or (f) authorize or approve reacquisition of shares, except according to a formula or method prescribed by the Board of Directors. The creation of, delegation of authority to, or action by a committee does not alone constitute compliance by a Director with the standards of conduct described in Section 19 of this Article.

Section 18. Compensation. The Board of Directors may fix the compensation of Directors.

Section 19. Standard of Conduct for Directors.

(a) A Director shall discharge his or her duties as a Director, including his or her duties as a member of a committee: (i) in good faith; (ii) with the care that a person in a like position would reasonably believe appropriate under similar circumstances; and (iii) in a manner the Director reasonably believes to be in the best interests of the Corporation. In determining what the Director reasonably believes to be in the best interests of the Corporation, a Director may consider the interests of the Corporation's employees, suppliers, creditors and customers, the economy of the state, the region and the nation, community and societal considerations, and the long-term and short-term interests of the Corporation and its shareholders, including the possibility that these interests may be best served by the continued independence of the Corporation.

(b) In discharging his or her duties, a Director who does not have knowledge that makes reliance unwarranted is entitled to rely on information, opinions, reports, or statements, including financial statements and other financial data, if prepared or presented by: (i) one or more officers or employees of the Corporation whom the Director reasonably believes to be reliable and competent with respect to the information, opinions, reports or statements presented; (ii) legal counsel, public accountants, or other persons retained by the Corporation, as to matters involving skills or expertise the Director reasonably believes are matters (x) within the particular person's professional or expert competence or (y) as to which the particular person merits confidence; or (iii) a committee of the Board of Directors of which the Director is not a member if the Director reasonably believes the committee merits confidence.

(c) A Director is not liable for any action taken as a Director, or any failure to take any action, if he or she performed the duties of his or her office in compliance with this Section.

Section 20. Conflict of Interest.

(a) A conflict of interest transaction is a transaction with the Corporation in which a Director of the Corporation has a material direct or indirect interest. A conflict of interest transaction is not voidable by the Corporation solely because of the Director's interest in the transaction if any one of the following is true:

(i) the material facts of the transaction and the Director's interest were disclosed or known to the Board of Directors or a committee of the Board of Directors and the Board of Directors or committee authorized, approved, or ratified the transaction;

(ii) the material facts of the transaction and the Director's interest were disclosed or known to the shareholders entitled to vote and they authorized, approved, or ratified the transaction; or

(iii) the transaction was fair to the Corporation.

(b) For purposes of this Section, and without limiting the interests that may create conflict of interest transactions, a Director of the Corporation has an indirect interest in a

transaction if: (i) another entity in which he or she has a material financial interest or in which he or she is a general partner is a party to the transaction; or (ii) another entity of which he or she is a director, officer, manager or trustee or in which he or she holds another position is a party to the transaction and the transaction is or should be considered by the Board of Directors of the Corporation.

(c) For purposes of clause (1) of subsection (a), a conflict of interest transaction is authorized, approved, or ratified if it receives the affirmative vote of a majority of the Directors on the Board of Directors (or on the committee) who have no direct or indirect interest in the transaction, but a transaction may not be authorized, approved, or ratified under this Section by a single Director. If a majority of the Directors who have no direct or indirect interest in the transaction vote to authorize, approve, or ratify the transaction, a quorum is present for the purpose of taking action under this Section. The presence of, or a vote cast by, a Director with a direct or indirect interest in the transaction does not affect the validity of any action taken under clause (1) of subsection (a) if the transaction is otherwise authorized, approved, or ratified as provided in that subsection.

(d) For purposes of clause (2) of subsection (a), a conflict of interest transaction is authorized, approved, or ratified if it receives the vote of a majority of the shares entitled to be counted under this subsection. Shares owned by or voted under the control of a Director who has a direct or indirect interest in the transaction, and shares owned by or voted under the control of an entity described in clause (i) of subsection (b), may not be counted in a vote of shareholders to determine whether to authorize, approve, or ratify a conflict of interest transaction under clause (2) of subsection (a). The vote of those shares, however, is counted in determining whether the transaction is approved under other Sections of these By-Laws. A majority of the shares, whether or not present, that are entitled to be counted in a vote on the transaction under this subsection constitutes a quorum for the purpose of taking action under this Section.

Section 21. Loans to Directors. The Corporation may not lend money to, or guarantee the obligation of a Director of, the Corporation unless: (a) the specific loan or guarantee is approved by a majority of the votes represented by the outstanding voting shares of all classes, voting as a single voting group, except the votes of shares owned by or voted under the control of the benefited Director; or (b) the Corporation's Board of Directors determines that the loan or guarantee benefits the Corporation and either approves the specific loan or guarantee or a general plan authorizing loans and guarantees. The fact that a loan or guarantee is made in violation of this Section shall not affect the borrower's liability on the loan.

ARTICLE III

MANNER OF NOTICE

All notices hereunder shall conform to the following requirements:

Section 1. Written Notice. Notice shall be in writing unless oral notice is reasonable under the circumstances. Notice by electronic transmission is written notice.

Section 2. Method of Notice. Notice may be communicated in person; by telephone, voice mail or other electronic means; by mail; by electronic transmission; or by messenger or delivery service. If these forms of personal notice are impracticable, notice may be communicated by a newspaper of general circulation in the area where published; or by radio, television, or other form of public broadcast communication.

Section 3. Effectiveness of Notice; General. Written notice, other than notice by electronic transmission, if in a comprehensible form, is effective upon deposit in the United States mail, if mailed post-paid and correctly addressed to the shareholder's address shown in the Corporation's current record of shareholders.

Section 4. Effectiveness of Electronic Notice. Written notice by electronic transmission, if in comprehensible form, is effective: (a) if by facsimile telecommunication, when directed to a number furnished by the shareholder for the purpose; (b) if by electronic mail, when directed to an electronic mail address furnished by the shareholder for the purpose; (c) if by a posting on an electronic network together with separate notice to the shareholder of such specific posting, directed to an electronic mail address furnished by the shareholder for the purpose, upon the later of (i) such posting and (ii) the giving of such separate notice; and (iii) if by any other form of electronic transmission, when directed to the shareholder in such manner as the shareholder shall have specified to the Corporation. An affidavit of the Secretary or an Assistant Secretary of the Corporation, the transfer agent or other agent of the Corporation that the notice has been given by a form of electronic transmission shall, in the absence of fraud, be prima facie evidence of the facts stated therein.

Section 5. Other Effectiveness of Notice. Except as provided in Sections 3 and 4 of the Article III, written notice, if in a comprehensible form, is effective at the earliest of the following: (a) when received; or (b) on the date of publication if notice by publication is permitted.

Section 6. Effectiveness of Oral Notice. Oral notice is effective when communicated if communicated in a comprehensible manner.

ARTICLE IV

OFFICERS

Section 1. Enumeration. The Corporation shall have a Chief Executive Officer, a President, a Treasurer, a Secretary and such other officers as may be appointed by the Board of Directors from time to time in accordance with these By-Laws, including, but not limited to, one or more Vice Presidents, Assistant Treasurers and Assistant Secretaries.

Section 2. Appointment. The officers shall be appointed by the Board of Directors. A duly appointed officer may appoint one or more officers or assistant officers if authorized by the Board of Directors. Each officer has the authority and shall perform the duties set forth in these By-Laws or, to the extent consistent with these By-Laws, the duties prescribed by the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers.

Section 3. Qualification. The same individual may simultaneously hold more than one office in the Corporation.

Section 4. Tenure. Officers shall hold office until the first meeting of the Directors following the next annual meeting of shareholders after their appointment and until their respective successors are duly appointed, unless a shorter or longer term is specified in the vote appointing them.

Section 5. Resignation. An officer may resign at any time by delivering notice of the resignation to the Corporation. A resignation is effective when the notice is delivered unless the notice specifies a later effective date. If a resignation is made effective at a later date and the Corporation accepts the future effective date, the Board of Directors may fill the pending vacancy before the effective date if the Board of Directors provides that the successor shall not take office until the effective date. An officer's resignation shall not affect the Corporation's contract rights, if any, with the officer.

Section 6. Removal. The Board of Directors may remove any officer at any time with or without cause. The appointment of an officer shall not itself create contract rights. An officer's removal shall not affect the officer's contract rights, if any, with the Corporation.

Section 7. Chief Executive Officer. The Chief Executive Officer shall have the duties and responsibilities as customarily belong to the office of Chief Executive Officer and shall have charge of the affairs of the Corporation subject to the supervision of the Board of Directors. Unless a Chairman of the Board and/or Vice-Chairman of the Board is elected by the Board of Directors, the Chief Executive Officer shall preside at all meetings of the stockholders, and if the Chief Executive Officer is a director, at all meetings of the Board of Directors.

Section 8. President. The President shall, subject to the direction of the Board of Directors and the Chief Executive Officer, have general charge and supervision of the day-to-day operations and business of the Corporation. Unless the Board of Directors has designated the Chairman of the Board or another officer as Chief Executive Officer, the President shall be the Chief Executive Officer of the Corporation. The President shall perform such other duties and shall have such other powers as the Board of Directors and/or the Chief Executive Officer may from time to time prescribe. The President shall execute bonds, mortgages and other contracts requiring a seal, under the seal of the Corporation, except where required or permitted by law to be otherwise signed and executed and except where the signing and execution thereof shall be expressly delegated by the Board of Directors to some other officer or agent of the Corporation.

Section 9. Vice Presidents. Any Vice President shall perform such duties and possess such powers as the Board of Directors or the Chief Executive Officer or President may from time to time prescribe. In the event of the absence, inability or refusal to act of the Chief Executive Officer and the President, the Vice President (or if there shall be more than one, the Vice Presidents in the order determined by the Board of Directors, or in the absence of any determination, then in the order of their election) shall perform the duties of the Chief Executive Officer and President (as applicable) and when so performing shall have all the powers of and be subject to all the restrictions upon the President. The Board of Directors may assign to any Vice

President the title of Executive Vice President, Senior Vice President or any other title selected by the Board of Directors.

Section 10. Treasurer. The Treasurer shall, subject to the direction of the Directors, have general charge of the financial affairs of the Corporation and shall cause to be kept accurate books of accounts. He or she shall have custody of all funds, securities, and valuable documents of the Corporation, except as the Directors may otherwise provide. The Treasurer shall perform such duties and have such powers additional to the foregoing as the Directors may designate.

Section 11. Secretary. The Secretary shall have responsibility for preparing minutes of the Directors' and shareholders' meetings and for authenticating records of the Corporation. The Secretary shall perform such duties and have such powers additional to the foregoing as the Directors shall designate.

Section 12. Standards Of Conduct For Officers. An officer shall discharge his or her duties: (a) in good faith; (b) with the care that a person in a like position would reasonably exercise under similar circumstances; and (c) in a manner the officer reasonably believes to be in the best interests of the Corporation. In discharging his or her duties, an officer, who does not have knowledge that makes reliance unwarranted, is entitled to rely on information, opinions, reports, or statements, including financial statements and other financial data, if prepared or presented by: (i) one or more officers or employees of the Corporation whom the officer reasonably believes to be reliable and competent with respect to the information, opinions, reports or statements presented; or (ii) legal counsel, public accountants, or other persons retained by the Corporation as to matters involving skills or expertise the officer reasonably believes are matters (x) within the particular person's professional or expert competence or (y) as to which the particular person merits confidence. An officer shall not be liable to the Corporation or its shareholders for any decision to take or not to take any action taken, or any failure to take any action, as an officer, if the duties of the officer are performed in compliance with this Section.

ARTICLE V

PROVISIONS RELATING TO SHARES

Section 1. Issuance and Consideration. The Board of Directors may issue the number of shares of each class or series authorized by the Articles of Organization. The Board of Directors may authorize shares to be issued for consideration consisting of any tangible or intangible property or benefit to the Corporation, including cash, promissory notes, services performed, contracts for services to be performed, or other securities of the Corporation. Before the Corporation issues shares, the Board of Directors shall determine that the consideration received or to be received for shares to be issued is adequate. The Board of Directors shall determine the terms upon which the rights, options or warrants for the purchase of shares or other securities of the Corporation are issued and the terms, including the consideration, for which the shares or other securities are to be issued.

Section 2. Share Certificates. If shares are represented by certificates, at a minimum each share certificate shall state on its face: (a) the name of the Corporation and that it is organized

under the laws of The Commonwealth of Massachusetts; (b) the name of the person to whom issued; and (c) the number and class of shares and the designation of the series, if any, the certificate represents. If different classes of shares or different series within a class are authorized, then the variations in rights, preferences and limitations applicable to each class and series, and the authority of the Board of Directors to determine variations for any future class or series, must be summarized on the front or back of each certificate. Alternatively, each certificate may state conspicuously on its front or back that the Corporation will furnish the shareholder this information on request in writing and without charge. Each share certificate shall be signed, either manually or in facsimile, by the: (i) Chief Executive Officer or the President; and (ii) by the Treasurer or the Secretary. If the person who signed, either manually or in facsimile, a share certificate no longer holds office when the certificate is issued, the certificate shall be nevertheless valid.

Section 3. Uncertificated Shares. The Board of Directors may authorize the issue of some or all of the shares of any or all of the Corporation's classes or series without certificates. The authorization shall not affect shares already represented by certificates until they are surrendered to the Corporation. Within a reasonable time after the issue or transfer of shares without certificates, the Corporation shall send the shareholder a written statement of the information required by the MBCA to be on certificates.

Section 4. Record and Beneficial Owners. The Corporation shall be entitled to treat as the shareholder the person in whose name shares are registered in the records of the Corporation or, if the Board of Directors has established a procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the Corporation as a shareholder, the beneficial owner of shares to the extent of the rights granted by a nominee certificate on file with the Corporation.

Section 5. Lost or Destroyed Certificates. The Board of Directors may, subject to Massachusetts General Laws, Chapter 106, Section 8-405, determine the conditions upon which a new share certificate may be issued in place of any certificate alleged to have been lost, destroyed, or wrongfully taken. The Board of Directors may, in its discretion, require the owner of such share certificate, or his or her legal representative, to: (a) give a bond, sufficient in its opinion, with or without surety; and/or (b) indemnify the Corporation, against any loss or claim which may arise by reason of the issue of the new certificate.

ARTICLE VI

CORPORATE RECORDS

Section 1. Records to be Kept.

(a) The Corporation shall keep as permanent records minutes of all meetings of its shareholders and Board of Directors, a record of all actions taken by the shareholders or Board of Directors without a meeting, and a record of all actions taken by a committee of the Board of Directors in place of the Board of Directors on behalf of the Corporation. The Corporation shall maintain appropriate accounting records. The Corporation or its agent shall maintain a record of its shareholders, in a form that permits preparation of a list of the names

and, addresses of all shareholders, in alphabetical order by class of shares showing the number and class of shares held by each. The Corporation shall maintain its records in written form or in another form capable of conversion into written form within a reasonable time.

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

(i) its Articles of Organization and all amendments and/or restatements to them currently in effect;

(ii) its By-Laws and all amendments and/or restatements to them currently in effect;

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

(iv) the minutes of all shareholders' meetings, and records of all action taken by shareholders without a meeting, for the past three (3) years;

(v) all written communications to shareholders generally within the past three years, including the financial statements furnished under Section 16.20 of the MBCA for the past three (3) years;

(vi) a list of the names and business addresses of its current Directors and officers; and

(vii) its most recent annual report delivered to the Secretary of The Commonwealth of Massachusetts.

Section 2. Inspection of Records by Shareholders.

(a) A shareholder is entitled to inspect and copy, during regular business hours at the office where they are maintained pursuant to Section 1(b) of this Article, copies of any of the records of the Corporation described in said Section if he or she gives the Corporation written notice of his or her demand at least five (5) business days before the date on which he or she wishes to inspect and copy.

(b) A shareholder is entitled to inspect and copy, during regular business hours at a reasonable location specified by the Corporation, any of the following records of the Corporation if the shareholder meets the requirements of subsection (c) and gives the Corporation written notice of his or her demand at least five (5) business days before the date on which he or she wishes to inspect and copy:

(i) excerpts from minutes reflecting action taken at any meeting of the Board of Directors, records of any action of a committee of the Board of Directors while acting in place of the Board of Directors on behalf of the Corporation, minutes of any meeting of the

shareholders, and records of action taken by the shareholders or Board of Directors without a meeting, to the extent not subject to inspection under subsection (a) of this Section 1;

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

(iii) the record of shareholders described in Section 1(a) of this Article.

(c) A shareholder may inspect and copy the records described in subsection (b) of this Section 1 only if:

(i) his or her demand is made in good faith and for a proper purpose;

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

(iii) the records are directly connected with his or her purpose; and

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

(d) For purposes of this Section, "shareholder" includes a beneficial owner whose shares are held in a voting trust or by a nominee on his or her behalf.

Section 3. Scope of Inspection Right.

(a) A shareholder's agent or attorney has the same inspection and copying rights as the shareholder represented.

(b) The Corporation may, if reasonable, satisfy the right of a shareholder to copy records under Section 2 of this Article by furnishing to the shareholder copies by photocopy or other means chosen by the Corporation including copies furnished through an electronic transmission.

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

(d) The Corporation may comply at its expense, with a shareholder's demand to inspect the record of shareholders under Section 2(b)(iii) of this Article by providing the shareholder with a list of shareholders that was compiled no earlier than the date of the shareholder's demand.

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

Section 4. Inspection of Records by Directors. A Director is entitled to inspect and copy the books, records and documents of the Corporation at any reasonable time to the extent reasonably related to the performance of the Director's duties as a Director, including duties as a member of a committee, but not for any other purpose or in any manner that would violate any duty to the Corporation.

ARTICLE VII

INDEMNIFICATION

Section 1. Definitions. In this Article the following words shall have the following meanings unless the context requires otherwise:

"Corporation", includes any domestic or foreign predecessor entity of the Corporation in a merger.

"Director" or "officer", an individual who is or was a Director or officer, respectively, of the Corporation or who, while a Director or officer of the Corporation, is or was serving at the Corporation's request as a director, officer, manager, partner, trustee, employee, or agent of another domestic or foreign corporation, limited liability company, partnership, joint venture, trust, employee benefit plan, or other entity. A Director or officer is considered to be serving an employee benefit plan at the Corporation's request if his or her duties to the Corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or beneficiaries of the plan. "Director" or "officer" includes, unless the context requires otherwise, the estate or personal representative of a Director or officer.

"Disinterested Director", a Director who, at the time of a vote or selection referred to in Section 4 of this Article, is not: (a) a party to the proceeding, or (b) an individual having a familial, financial, professional or employment relationship with the Director whose indemnification or advance for expenses is the subject of the decision being made, which relationship would, in the circumstances, reasonably be expected to exert an influence on the Director's judgment when voting on the decision being made.

"Expenses", all reasonable expenses incurred by a Party in connection with a Proceeding, includes counsel fees.

"Liability", the obligation to pay a judgment, settlement, penalty, fine including an excise tax assessed with respect to an employee benefit plan, or reasonable expenses incurred with respect to a proceeding.

"Party", an individual who was, is, or is threatened to be made, a defendant or respondent in a Proceeding.

"Proceeding", any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, arbitral, or investigative and whether formal or informal.

Section 2. Indemnification of Directors and Officers.

(a) Except as otherwise provided in this Section 2, the Corporation shall indemnify to the fullest extent permitted by law an individual who is a party to a Proceeding because he or she is a Director or officer against liability incurred in the Proceeding if:

(i) (x) he or she conducted himself or herself in good faith; (y) he or she reasonably believed that his or her conduct was in the best interests of the Corporation or that his or her conduct was at least not opposed to the best interests of the Corporation; and (z) in the case of any criminal proceeding, he or she had no reasonable cause to believe his or her conduct was unlawful; or

(ii) he or she engaged in conduct for which he or she shall not be liable under a provision of the Articles of Organization authorized by Section 2.02(b)(4) of the MBCA or any successor provision to such Section.

(b) A Director's or officer's conduct with respect to an employee benefit plan for a purpose he or she reasonably believed to be in the interests of the participants in, and the beneficiaries of, the plan is conduct that satisfies the requirement that his or her conduct was at least not opposed to the best interests of the Corporation.

(c) The termination of a Proceeding by judgment, order, settlement, or conviction, or upon a plea of nolo contendere or its equivalent, is not, of itself, determinative that the Director or officer did not meet the relevant standard of conduct described in this Section.

(d) Unless ordered by a court, the Corporation may not indemnify a Director or officer under this Section if his or her conduct did not satisfy the standards set forth in subsection (a) or subsection (b).

Section 3. Advance for Expenses. The Corporation shall, before final disposition of a Proceeding, advance funds to pay for or reimburse the reasonable Expenses incurred by a Director or officer who is a Party to a Proceeding because he or she is a Director or officer if he or she delivers to the Corporation:

(a) a written affirmation of his or her good faith belief that he or she has met the relevant standard of conduct described in Section 2 of this Article or that the Proceeding involves conduct for which liability has been eliminated under a provision of the Articles of Organization as authorized by Section 2.02(b)(4) of the MBCA or any successor provision to such Section; and

(b) his or her written undertaking to repay any funds advanced if he or she is not wholly successful, on the merits or otherwise, in the defense of such Proceeding and it is ultimately determined pursuant to Section 4 of this Article or by a court of competent jurisdiction that he or she has not met the relevant standard of conduct described in Section 2 of this Article. Such undertaking must be an unlimited general obligation of the Director or officer, but need not be secured and shall be accepted without reference to the financial ability of the Director or officer to make repayment.

Section 4. Determination of Indemnification. The determination of whether a Director officer has met the relevant standard of conduct set forth in Section 2 shall be made:

(a) if there are two or more Disinterested Directors, by the Board of Directors by a majority vote of all the Disinterested Directors, a majority of whom shall for such purpose constitute a quorum, or by a majority of the members of a committee of two (2) or more Disinterested Directors appointed by vote;

(b) by special legal counsel: (i) selected in the manner prescribed in clause (a); or (ii) if there are fewer than two (2) Disinterested Directors, selected by the Board of Directors, in which selection Directors who do not qualify as Disinterested Directors may participate; or

(c) by the shareholders, but shares owned by or voted under the control of a Director who at the time does not qualify as a Disinterested Director may not be voted on the determination.

Section 5. Notification and Defense of Claim; Settlements.

(a) In addition to and without limiting the foregoing provisions of this Article and except to the extent otherwise required by law, it shall be a condition of the Corporation's obligation to indemnify under Section 2 of this Article (in addition to any other condition provide in these By-Laws or by law) that the Party asserting, or proposing to assert, the right to be indemnified, must notify the Corporation in writing as soon as practicable of any Proceeding or investigation involving such Party for which indemnity will or could be sought, but the failure to so notify shall not affect the Corporation's obligation to indemnify except to the extent the Corporation is adversely affected thereby. With respect to any Proceeding as to which the Corporation is so notified, the Corporation will be entitled to participate therein at its own expense and/or to assume the defense thereof at its own expense, with legal counsel reasonably acceptable to the applicable Party. After notice from the Corporation to such Party of its election so to assume such defense, the Corporation shall not be liable to such Party for any legal or other expenses subsequently incurred by such Party in connection with such Proceeding or investigation other than as provided below in this subsection (a). The applicable Party shall have the right to employ his or her own counsel in connection with such Proceeding or investigation, but the fees and expenses of such counsel incurred after notice from the Corporation of its assumption of the defense thereof shall be at the expense of such Party unless: (i) the employment of counsel by such Party has been authorized by the Corporation; (ii) counsel to such Party shall have reasonably concluded, in a writing provided to the Corporation, that there may be a conflict of interest or position on any significant issue between the Corporation and such Party in the conduct of the defense of such Proceeding or investigation; or (iii) the Corporation shall not in fact have employed counsel to assume the defense of such Proceeding or investigation, in each of which cases the Expenses of counsel for such Party shall be at the expense of the Corporation, except as otherwise expressly provided by this Article. The Corporation shall not be entitled, without the consent of the applicable Party, to assume the defense of any claim brought by or in the right of the Corporation or as to which counsel for such Party shall have reasonably made the conclusion provided for in clause (ii) above.

(b) The Corporation shall not be required to indemnify any applicable Party under this Article for any amounts paid in settlement of any Proceeding unless authorized in the same manner as the determination that indemnification is permissible under Section 4 of this Article, except that if there are fewer than two (2) Disinterested Directors, authorization of indemnification shall be made by the Board of Directors, in which authorization Directors who do not qualify as Disinterested Directors may participate. The Corporation shall not settle any Proceeding or investigation without the applicable Party's written consent unless such settlement: (i) includes a full release of the applicable Party from all claims comprising the Proceeding or investigation; (ii) does not in any manner indicate that the applicable Party contributed to or was responsible for the cause of any claims comprising the Proceeding or investigation; or (iii) does not impose any obligations upon the applicable Party or requires the applicable Party to take any action. Neither the Corporation nor such Party will unreasonably withhold their consent to any proposed settlement.

Section 6. Insurance. The Corporation may purchase and maintain insurance on behalf of an individual who is a Director or officer of the Corporation, or who, while a Director or officer of the Corporation, serves at the Corporation's request as a director, officer, manager, partner, trustee, employee, or agent of another domestic or foreign corporation, limited liability company, partnership, joint venture, trust, employee benefit plan, or other entity, against liability asserted against or incurred by him or her in that capacity or arising from his or her status as a Director or officer, whether or not the Corporation would have power to indemnify or advance expenses to him or her against the same liability under this Article.

Section 7. Application of this Article.

(a) The Corporation shall not be obligated to indemnify or advance expenses to a Director or officer of a predecessor of the Corporation, pertaining to conduct with respect to the predecessor, unless otherwise specifically provided.

(b) This Article shall not limit the Corporation's power to: (i) pay or reimburse expenses incurred by a Director or an officer in connection with his or her appearance as a witness in a Proceeding at a time when he or she is not a Party; or (ii) indemnify, advance expenses to or provide or maintain insurance on behalf of an employee or agent.

(c) The indemnification and advancement of expenses provided by, or granted pursuant to, this Article shall not be considered exclusive of any other rights to which those seeking indemnification or advancement of expenses may be entitled.

(d) Each person who is or becomes a Director or officer shall be deemed to have served or to have continued to serve in such capacity in reliance upon the indemnity provided for in this Article. All rights to indemnification under this Article shall be deemed to be provided by a contract between the Corporation and the person who serves as a Director or officer of the Corporation at any time while these By-Laws and the relevant provisions of the MBCA are in effect. Any repeal or modification thereof shall not affect any rights or obligations then existing.

(e) If the laws of The Commonwealth of Massachusetts are hereafter amended from time to time to increase the scope of permitted indemnification, indemnification hereunder shall be provided to the fullest extent permitted or required by any such amendment.

ARTICLE VIII

FISCAL YEAR

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

ARTICLE IX

AMENDMENTS

Section 1. General. These By-Laws amend and restate, in their entirety, the By-laws of the Corporation adopted on June 13, 2013, as amended to date. The power to make, amend or repeal these By-Laws shall be in the shareholders. If authorized by the Articles of Organization, the Board of Directors may also make, amend or repeal these By-Laws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in the MBCA, the Articles of Organization, or these By-Laws, requires action by the shareholders.

Section 2. Notice of Amendment; Repeal by Shareholders. Not later than the time of giving notice of the meeting of shareholders next following the making, amending or repealing by the Board of Directors of any By-Law, notice stating the substance of the action taken by the Board of Directors shall be given to all shareholders who would have been entitled to vote on amending the By-Laws. Any action taken by the Board of Directors with respect to the By-Laws may be amended or repealed by the shareholders.

Section 3. Amendment of Shareholder Quorum Requirements. Approval of an amendment to the By-Laws that changes or deletes a quorum or voting requirement for action by shareholders must satisfy both the applicable quorum and voting requirements for action by shareholders with respect to amendment of these By-Laws and also the particular quorum and voting requirements sought to be changed or deleted.

Section 4. Board of Director Restrictions. A By-Law dealing with quorum or voting requirements for shareholders, including additional voting groups, may not be adopted, amended or repealed by the Board of Directors.

Section 5. Amendment of Board of Directors Quorum Requirements. A By-Law that fixes a greater or lesser quorum requirement for action by the Board of Directors, or a greater voting requirement, than provided for by the MBCA may be amended or repealed by the shareholders, or by the Board of Directors if authorized pursuant to subsection (a) of this Article IX.

Section 6. Board of Director Quorum Requirements. If the Board of Directors is authorized to amend the By-Laws, approval by the Board of Directors of an amendment to the By-Laws that changes or deletes a quorum or voting requirement for action by the Board of

Directors must satisfy both the applicable quorum and voting requirements for action by the Board of Directors with respect to amendment of the By-Laws, and also the particular quorum and voting requirements sought to be changed or deleted.

[END OF BY-LAWS]



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

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



312659621

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Sira Naturals, Inc
13 COMMERCIAL WAY
MILFORD, MA 01757

EAN: 22026416
January 25, 2021

Certificate Id:44810

The Department of Unemployment Assistance certifies that as of 1/25/2021, Sira Naturals, Inc is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149, §189.

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

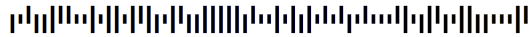
Richard A. Jeffers, Director

Department of Unemployment Assistance



mass.gov/dor

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



SIRA NATURALS, INC
240 ELM ST BSMT
SOMERVILLE MA 02144-2935

Why did I receive this notice?

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

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

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

What if I have questions?

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

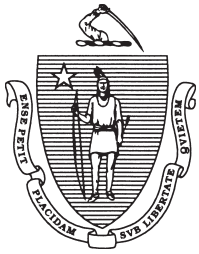
Visit us online!

Visit mass.gov/dor 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

000031



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

William Francis Galvin
Secretary of the
Commonwealth

Date: February 26, 2021

To Whom It May Concern :

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

is a domestic corporation organized on **February 07, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 21020748280

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

Processed by: tad



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$100.00

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

Annual Report

(General Laws, Chapter 156D, Section 16.22; 950 CMR 113.57)

Identification Number: 001312028

1. Exact name of the corporation: SIRA NATURALS, INC.

2. Jurisdiction of Incorporation: State: MA Country:

3,4. Street address of the corporation registered office in the commonwealth and the name of the registered agent at that office:

Name: CORPORATE CREATIONS NETWORK INC.
 No. and Street: 225 CEDAR HILL STREET #200
 City or Town: MARLBOROUGH State: MA Zip: 01752 Country: USA

5. Street address of the corporation's principal office:

No. and Street: 300 TRADE CENTER, STE. 7750
 City or Town: WOBURN State: MA Zip: 01801 Country: USA

6. Provide the name and addresses of the corporation's board of directors and its president, treasurer, secretary, and if different, its chief executive officer and chief financial officer.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	DAVID S. ROSENBERG	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
TREASURER	LOUIS F. KARGER	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
SECRETARY	LOUIS F. KARGER	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
DIRECTOR	LOUIS F. KARGER	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
DIRECTOR	JONATHAN SANDELMAN	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
DIRECTOR	DAVID S. ROSENBERG	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
DIRECTOR	ERIC J. WARDROP	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA
DIRECTOR	ROBERT A. EDELSTEIN	300 TRADE CENTER STE, 700 WOBURN, MA 01801 USA

7. Briefly describe the business of the corporation:

MANUFACTURE MEDICINAL AND RECREATIONAL CANNABIS

8. Capital stock of each class and series:

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CNP	\$0.00000	137,500	\$0.00	0
CNP	\$0.00000	137,500	\$0.00	0

9. Check here if the stock of the corporation is publicly traded:

10. Report is filed for fiscal year ending: 12/31/ 2020

Signed by **DAVID S. ROSENBERG** , its **PRESIDENT**
on this **12** Day of **February**, **2021**



CERTIFICATE OF LIABILITY INSURANCE

EMBROKER

DATE (MM/DD/YYYY)

10/27/2020

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

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

PRODUCER Embroker Insurance Services LLC 24 Shotwell Street San Francisco, CA, 94103	CONTACT NAME: PHONE (A/C. No. Ext): (844) 436-2765	FAX (A/C. No.):
	E-MAIL ADDRESS: certificates@embroker.com	
INSURER(S) AFFORDING COVERAGE		NAIC #
INSURER A: Trisura Specialty Insurance Company	16188	
INSURED AYR Strategies; LivFree Wellness LLC dba CannaPunch of Nevada; SIR NATURALS 590 Madison Ave 26th Floor New York, NY, 10022	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

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

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

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:	Y		TRQSG001172-00	01/04/2020	01/04/2021	EACH OCCURRENCE \$ 5,000,000
	DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 250,000						
	MED EXP (Any one person) \$						
	PERSONAL & ADV INJURY \$ 1,000,000						
							GENERAL AGGREGATE \$ 5,000,000
							PRODUCTS - COMP/OP AGG \$
							\$
A	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS			TRQSG001172-00	01/04/2020	01/04/2021	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000
	BODILY INJURY (Per person) \$						
	BODILY INJURY (Per accident) \$						
	PROPERTY DAMAGE (Per accident) \$						
							\$
	UMBRELLA LIAB <input type="checkbox"/> EXCESS LIAB OCCUR <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$						EACH OCCURRENCE \$
							AGGREGATE \$
							\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N					PER STATUTE OTH-ER
							E.L. EACH ACCIDENT \$
							E.L. DISEASE - EA EMPLOYEE \$
							E.L. DISEASE - POLICY LIMIT \$
A	Property Coverage			TRQSG001172-00	01/04/2020	01/04/2021	Aggregate 10,000,000
A	Business Interruption			TRQSG001172-00	01/04/2020	01/04/2021	Aggregate 3,000,000
A	Products Liability			TRQSG001172-00	01/04/2020	01/04/2021	EA Claim/Aggregate 5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Sira Naturals, Inc is listed as Additional Insured on the General Liability, Product Liability and Property as per written contract.

- A - Products Liability - TRQSG001172-00 - 01/04/2020 - 01/04/2021 - Each Occurrence Limit - \$5,000,000;
- A - Products Liability - TRQSG001172-00 - 01/04/2020 - 01/04/2021 - Operations General Aggregate - \$5,000,000;
- A - Products Liability - TRQSG001172-00 - 01/04/2020 - 01/04/2021 - Each Claim/Policy Term Aggregate - \$5,000,000;

CERTIFICATE HOLDER**CANCELLATION**

Sira Naturals, Inc 300 Trade Center, suite 7700 Woburn, MA, 01801	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE

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SUMMARY BUSINESS PLAN

Business Description

Sira Naturals currently operates three Registered Marijuana Dispensaries pursuant to 935 CMR 501.000 et. seq. In support of its RMDs, Sira Naturals operates two 30,000 square foot cannabis cultivation and product manufacturing facilities at 13 Commercial Way and 1 Industrial Way, Milford, Massachusetts. The Milford facilities currently hold two adult-use Tier 3 Cultivation License, one adult-use Product Manufacturing license and one adult-use Existing Licensee Transporter license, in addition to its medical licenses.

Market Analysis

Sira believes that significant latent demand exists for consumption of adult-use cannabis products in Massachusetts. The pace of adult-use cultivation and manufacturing capacity expansion will not match the demand for cannabis products in the near to medium term. Because of these market conditions, Sira believes that additional retail locations and cultivation and manufacturing capacity is required to satisfy the growing demand for regulated cannabis products in Massachusetts.

Organization Management

Sira Naturals was founded and is operated by Massachusetts natives and residents. Sira operates a vertically integrated business that encompasses the following business units: cultivation, flower processing, extractions, infusions, packaging, logistics, and retail. The complexity of the business necessitates an integrated management structure. Each department is headed by an area expert who reports up to a Vice President/Department Head. Department Heads are grouped into the areas of sales, production, finance, community and government relations, and human resources. Department Heads report to the Board of Directors, led by David Rosenberg, President.

A Sira Naturals' founder, David Rosenberg, a 4-year veteran of the Sira Board, transitioned as Sira's President effective April 1, 2020. David brings a long and storied career running successful New England companies. Among many other accolades, David was recently awarded the Boston Business Journal's 2019 CEO Social Leadership Award given to the regional executive who has gone above and beyond to innovate and create solutions to the area's biggest community challenges. Sira is thrilled to have David who embodies Sira's priorities of family, community, and a commitment to equity and excellence.

Sales Strategies

Regulated cannabis market participants will compete on quality, price and service support of their product mix. Moreover, Sira believes that success in this market depends on public participation with the broad cannabis stakeholder community to ensure a strong and well-regulated industry in Massachusetts. Sira plans to expand upon its presence as a wholesaler in the adult-use marketplace with three, wholly-owned, adult use dispensaries in the cities of Somerville, Watertown, and Boston. Sira will leverage relationships with existing retailers and build relationships with new product manufacturers and retailers as they are licensed by the Commission.

Sira's five-year sales projections, should we be awarded the applied-for licenses are as follows:

Sira Naturals 5 Year Sales Projections	Total 2020	Total 2021	Total 2022	Total 2023	Total 2024	Total 2025
Total Wholesale Sales	\$ 32,771,089	\$ 25,894,284	\$ 62,729,738	\$ 53,913,441	\$ 43,505,319	\$ 34,437,594
Total Retail Sales	\$ 18,609,927	\$ 30,829,543	\$ 57,552,076	\$ 66,171,020	\$ 73,797,723	\$ 82,391,684
TOTAL SIRA Sales	\$ 51,381,016	\$ 56,723,827	\$ 120,281,814	\$ 120,084,461	\$ 117,303,043	\$ 116,829,278

Funding Requirements

Sira Naturals will continue to fund its operations with cash flows generated by operations.

Sira Naturals, Inc.
Liability Insurance

The purpose of this plan is to outline how Sira Naturals, Inc. will maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement. Sira Naturals, Inc. has obtained General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10).

Plan

Sira Naturals, Inc. will maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. The deductible for each policy will be no higher than \$5,000 per occurrence.

Sira Naturals, Inc. will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.



RECORD KEEPING PROCEDURES

Sira Naturals maintains numerous written operational, personnel, and business records that will be made available for inspection by the Commission, upon request. Sira records are maintained in accordance with generally accepted accounting principles. Sira's human resources department retains and destroys personnel records in accordance with Sira's corporate policies on business records retention, as well as federal and state laws governing record retention. The following employee information records are maintained in segregated personnel files: Pre-employment testing results and background check information; I-9 forms; benefits plan and employee medical records; health and safety records; general employee personnel records.

Commission compliance reports are maintained in reverse chronological sequence and filed separately from the above employee information records. All paper personnel records, confidential employee data, and other paper records maintained by Sira Naturals is destroyed by shredding after retention dates have passed. Hardcopy confidential records are shredded using a locked shredder on the Sira Naturals premises.

When Sira is involved in or anticipates that it may be involved in litigation, the CEO's office will issue a litigation hold. This means that all documents relating to the litigation matter must be kept in order to preserve any potential evidence. In the event that the CEO announces a litigation hold on any or all Sira records as a result of pending or anticipated litigation, all records covered by such litigation hold **MUST NOT** be discarded, deleted or destroyed. Further, the IT department will suspend the automatic deletion of emails for all individuals covered by the litigation hold.

Access to the Commission

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

Types of Records (Adult Use)

The following records will be maintained and stored by Sira and available to the Commission upon request:

- Operating procedures as required by 935 CMR 500.105(1):
 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
 - 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;
- 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);
- 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;
- A policy for the immediate dismissal of any marijuana establishment agent who has:
 - Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
 - Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall 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 members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.
- Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- 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 shall 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 the 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.
- Operating procedures as required by 935 CMR 500.120(12);
 - Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
 - Policies and procedures for handling voluntary and mandatory recalls of marijuana. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana from the market, as well as any action undertaken to promote public health and safety;
 - Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is segregated from other marijuana and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);
 - Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
 - Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures at a minimum, must be in compliance with 935 CMR 500.105(15) and 935 CMR 500.120(11); and
 - Policies and procedures for the transfer, acquisition, or sale of marijuana between Marijuana Establishments.
- Inventory records as required by 935 CMR 500.105(8); and
- Seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e),
- Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;
 - 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. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - 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; and
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe work conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030
- Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, stipend paid to each board member, and an executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- Waste disposal records as required under 935 CMR 500.105(12); and
- Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
- Responsible vendor training program compliance records.
- Vehicle registration, inspection and insurance records.

Types of Records (Medical Use)

Sira records will be available for inspection by the Commission upon request. Written records that are required and are subject to inspection include, but are not limited to, all records required in any section of 935 CMR 501.000, in addition to the following

- Security measures in compliance with 935 CMR 501.110;
- Employee security policies, including personal safety and crime prevention techniques;
- A description of the MTC's:
 - Hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 501.100(6)(d); and

- Price list for marijuana, MIPs, and any other available products, and alternate price lists for patients with documented verified financial hardship as required by 935 CMR 501.100(1)(f);
- Storage of marijuana in compliance with 935 CMR 501.105(4);
- Description of the various strains of marijuana to be cultivated and dispensed, and the form(s) in which marijuana will be dispensed;
- Procedures to ensure accurate recordkeeping, including inventory protocols and procedures for integrating a secondary electronic system with the Seed-to-sale SOR;
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 501.105(3)(b);
- A staffing plan and staffing records in compliance with 935 CMR 501.105(9)(d)3.;
- 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 in accordance with 935 CMR 501.200;
- A description of the MTC's patient education activities in accordance with 935 CMR 501.105(11);
- The standards and procedures by which the MTC determines the price it charges for marijuana, and a record of the prices charged, including the MTC's policies and procedures for the provision of marijuana to registered qualifying patients with verified financial hardship without charge or at less than the market price, as required by 935 CMR 501.100(1)(f);
- Written policies and procedures for the production and distribution of marijuana, which shall include, but not be limited to:
 - Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories;
 - A procedure for handling voluntary and mandatory recalls of marijuana. Such procedure shall be adequate to deal with recalls due to any action initiated at the requestor order of the Commission, and any voluntary action by an MTC to remove defective or potentially defective marijuana from the market, as well as any action undertaken to promote public health and safety;
 - A procedure for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is segregated from other marijuana and destroyed. This procedure shall provide for written documentation of the disposition of the marijuana;
 - Policies and procedures for patient or personal caregiver home-delivery; and
 - Policies and procedures for the transfer, acquisition, or sale of marijuana between MTCs, and if applicable, Marijuana Establishments and CMOs.
- A policy for the immediate dismissal of any MTC agent who has:
 - Diverted marijuana, which shall be reported to law enforcement officials and to the Commission; or
 - Engaged in unsafe practices with regard to operation of the MTC, which shall be reported to the Commission; and 935 CMR: CANNABIS CONTROL COMMISSION
- A list of all board members and executives of an MTC, and members, if any, of the entity, must be made available upon request by any individual. This requirement may be fulfilled by placing this information on the MTC's website.

- Policy and procedure for the handling of cash on MTC premises including, but not limited to, storage, collection frequency, and transport to financial institution(s).
- Operating procedures as required by 935 CMR 501.105(1);
- Inventory records as required by 935 CMR 501.105(7);
- Seed-to-sale tracking records for all marijuana and MIPs as required by 501.105(7)(e);
- The following personnel records:
 - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each MTC agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the MTC and shall include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 501.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - A copy of the application that the MTC submitted to the Commission on behalf of any prospective MTC agent;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All CORI reports obtained in accordance with M.G.L. c. 6, § 172, 935 CMR 501.030(3), and 803 CMR 2.00: Criminal Offender Record Information (CORI);
- Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records that indicate the name of the registered qualifying patient or personal caregiver to whom marijuana has been dispensed, including the quantity, form, and cost; and
Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with an MTC, including members of the nonprofit corporation, if any.
 - Waste disposal records as required under 935 CMR 501.105(10)(b); and
 - Following closure of an MTC, all records must be kept for at least two years at the expense of the MTC and in a form and location acceptable to the Commission.

Additional Records for Colocated Marijuana Operations (CMO)

Sira will maintain the following records as required in 935 CMR 502.000

- A plan for maintaining records, including plans for separating financial records for adult-use products to ensure compliance with the applicable tax laws;
- On a quarterly basis, Sira will submit to the Commission an inventory plan to reserve a sufficient quantity and variety of medical-use products for registered patients, based on reasonably anticipated patient needs as documented by sales records over the preceding six months.
 - On each occasion that the supply of any product within the reserved patient supply is exhausted and a reasonable substitution cannot be made, Sira will submit a report to the Commission in a form determined by the Commission.
 - Sira will perform audits of patient supply available on a weekly basis and retain these records for a period of six months.

Patient Records

A patient record will be established and maintained for each qualifying patient who obtains marijuana from the dispensary. All entries made to the qualifying patient record will be dated (date and time) and signed (electronically) by the authorized dispensary agent making the entry and will include the dispensary agent identification number. An entry within the patient record will be made to reflect each purchase, denial of sale, and educational materials provided. This data will also be analyzed to monitor the performance of the dispensary and improve the variety of services offered.

All systems accessed by dispensary agents will be password protected. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Dispensary Manger and Executive Management Team. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Incident Reporting

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

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



Policy for Separating Recreational from Medical Operations

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

To clearly and concisely outline our plan to continue to dispense marijuana and marijuana products to qualifying patients and their caregivers and once licensed, to consumers in the recreational market as a Licensed Marijuana Retailer.

Purpose

The purpose of this plan is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that there is separation between medical use of marijuana operations and recreational marijuana operations are in compliance with all regulations and laws.

General Requirements

As a Colocated Marijuana Operations (“CMO”) Sira will comply with the requirements for physical and virtual separation of medical-use and adult use marijuana and marijuana products

Sira will implement procedures for virtual, i.e., electronic, separation of medical-use and adult-use marijuana, MIPs, and marijuana products subject to Commission approval. Sira will use of plant or package tags in the Seed-to-sale SOR (“METRC”) for this separation.

Sira will attach plant tags to all marijuana clones and plants and attach package tags to all finished marijuana, MIPs and marijuana products and enter any remaining inventory, including seeds, into METRC.

Patient Supply

Sira will ensure access to a sufficient quantity and variety of Marijuana Products, including Marijuana, for Patients registered under 935 CMR 501.000.

- During the first 6 months of operation, Sira will reserve 35% of our Marijuana Products for patient sales.
- Once we have been open and dispensing for a period of six months or longer, Sira will maintain a quantity and variety of Marijuana Products for Patients registered under 935 CMR 501.000, sufficient to meet the demand indicated by an analysis of sales data collected by the Licensee during the preceding six months in accordance with 935 CMR 500.140(5): Recording Sales and 935 CMR 501.140(5).

Marijuana products reserved for patient supply shall, unless unreasonably impracticable, reflect the actual types and strains of Marijuana Products documented during the previous six months. If a substitution shall be made, the substitution shall reflect as closely as possible the type and strain no longer available.

On a biennial basis, Sira will submit to the Commission an inventory plan to reserve a sufficient quantity and variety of medical use Marijuana Products for Registered Qualifying Patients, based on reasonably anticipated patient needs as documented by sales records over the preceding six months. On each occasion that the supply of any product within the reserved patient supply is exhausted and a reasonable substitution cannot be made, Sira will submit a report to the Commission in a form determined by the Commission.

Marijuana Products reserved for patient supply will be either maintained on-site at the retailer or easily accessible at another location operated by Sira and transferable to the retailer location within 48 hours of notification that the on-site supply has been exhausted. Sira will perform audits of available patient supply on a weekly basis and retain those records for a period of six months.

Sira may transfer Marijuana Products reserved for medical-use to adult-use within a reasonable period of time prior to the date of expiration provided that the product does not pose a risk to health or safety.

Point of Sale

As a Colocated Marijuana Operations (CMO) Sira will use best efforts to prioritize patient and caregiver identification verification and physical entry into its retail area.

- Sira will have one or more separate Point of Sale (“POS”) station(s) and lines reserved solely for medical marijuana sales to Qualifying Patients or their Personal Caregivers. These POS station will:
 - Be ADA compliant for wheelchair and scooter access.
 - Be clearly marked that the POS station is for medical sales only
 - Be physically separated from the other POS stations with the use of semi-permanent stanchions with ropes or belts that create a physical barrier between medical and adult sales.
 - The stanchion and rope system will also create a separate line for patients and caregivers and will be clearly marked with a sign stating that these POS stations are for medical sales only.
 - The other POS stations will be clearly marked by signage stating that these lines and POS stations are for all sales, including medical.
 - Our patient marketing and patient/consumer education materials will also state that medical sales may be done at any POS station and that the holder of a medical

registration card may use either line and shall not be limited only to the medical use line.

- The facility has an area that is separate from the sales floor that allows for confidential consultation. The Consultation Room will have signage that reads, “Consultation Area” and will be accessible by a Qualifying Patient or caregiver without having to traverse a Limited Access Area.
- Virtual Separation of medical and adult sales will happen at the POS station. Sira POS System will be equipped to track medical and adult sales internally.
 - For each transaction Sira sales agent will ask each customer if there are any medical marijuana sales that will be completed.
 - If the answer is no, the sales agent will re-verify the customers age by checking the customers government issued ID card and entering the entire order as adult use and taxed and recorded appropriately.
 - If the customer states that medical sales are included, the Sales Agent will request the Patient Registration Card issued by the Commission and their second form of identification.
 - The Sales agent will enter the patient/caregiver information through the Commission-supported databases and verify the patient/caregiver registration is valid and that the patients 60-day supply has not been reached.
 - The sales agent will fill the patient/caregiver order and ask which items are for medical use.
 - If all items are for medical use the sales agent will first enter the amounts of marijuana purchased into the CNB interoperable database and ensure that the amount does not exceed the patients 60-day supply.
 - The order will be entered into the POS System. For each item or stock keeping unit (“SKU”) the sales agent will designate it as medical sales and the system will record it as such and not tax the transaction
 - If only some of the items are for medical use the sales agent will first enter the amounts of marijuana purchased into the Commission-supported database and ensure that the amount does not exceed the patients 60-day supply.
 - The sales agent will then verify that the patient is at least 21 years of age by checking the government

issued identification. If the patient is under 21 years of age, no adult use products may be sold

- The order will be entered into the POS System. For each item or SKU the patient/caregiver designates as medical use the sales agent will designate it as medical sales and the system will record it as such and not tax the item(s). For items or SKU's identified as adult use (and the patient is 21 years of age or older) these items will be entered into the POS system and taxed accordingly.
- At the end of each business day a report will be generated by the POS system that includes the data of all sales, medical and adult use. This report will be compared against the transaction data in the Metrc system and the Commission-supported database to ensure all medical and adult sales are correct.
- Sira will not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.

Patients under the age of 21

Registered, Qualifying patients may be under the age of 21 and will require access to marijuana for medical use. Sira is will not restrict access to our products to patients of any age so long as they are registered with the Commission.

While we do not expect a large number of patients who are under the age of 21 we are committed to giving them access to our products while also making sure that these patients cannot access products that are intended for adult use.

No customer will have direct access to marijuana products except at point of sale. All marijuana products are stored in locked cabinets behind the POS counter.

- Registered Patients under the age of 21 will be admitted into our facility only if the individual is 18 years of age or older and produces an active patient registration card issued by the Commission or the Commission. If the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active patient registration card and they are accompanied by their personal caregiver with an active patient registration card.
 - In addition to the active patient registration card, registered qualifying patients 18 years of age and older and personal caregivers must also produce proof of identification.
- In any case where a patient that is under the age of 21, Sira agent that determines the patient is under 21 years of age will notify the sales manager of this fact.

- The sales manager and the security agent will monitor the patient throughout the facility.
 - The Sales Agent or designee will offer personal assistance to the patient and/or caregiver while they are inside the facility.
 - At the POS Station the sales manager will notify the sales agent that the patient is under 21 to ensure that only medical sales occur.



PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Sira Naturals implements standard best practices in its human resources personnel policies and procedures. Sira places a heightened level of scrutiny on employees given the compliance environment and particularities of the marijuana industry. Every potential employee is carefully pre-screened for compliance with Commission regulations prior to hiring. All potential Sira agents apply and are vetted pursuant to 935 CMR 500.030. Background checks are conducted annually on all Sira personnel pursuant to 935 CMR 500.030(3).

Once onboard, our staff is provided with an employee handbook containing information about the policies and procedures of the organization, as well as benefits and opportunities available to employees. The Handbook contains all company personnel policies, including but not limited to:

- rules of conduct
- dress code
- alcohol and drug free workplace
- discipline
- confidentiality
- conflict of interest
- ethics
- whistle blower
- discrimination and harassment
- reasonable accommodation
- zero tolerance
- prohibition of retaliation
- emergency procedures
- work hours
- attendance and time off
- performance evaluations
- injuries
- termination
- leave policies
- holidays
- vacation
- personal and sick days
- maternity/paternity
- military leave and jury duty
- health insurance (including dental and vision)
- COBRA
- worker's compensation
- unemployment compensation

Sira will maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each Sira Agent. All records will be maintained for at least 12 months after termination of the individual's affiliation with Sira and will include, at a minimum, the following:
 - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;

- d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - e. Documentation of periodic performance evaluations;
 - f. A record of any disciplinary action taken; and
 - g. Notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe manufacturing & processing conditions;
 4. Personnel policies and procedures; and
 5. All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

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

All Sira board members, directors, employees, executives, managers, and volunteers will register with the Commission as a Sira Marijuana Establishment Agent (“Sira Agent”). For clarity, an “employee” means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing or dispensing of marijuana. All Sira Agents will:

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

Sira will submit to the Commission an application for every Sira Agent and our application will include;

1. The full name, date of birth, and address of the individual;
2. All aliases used previously or currently in use by the individual, including maiden name, if any;
3. A copy of the applicant’s driver’s license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity documents acceptable to the Commission;
4. An attestation that the individual will not engage in the diversion of marijuana products;
5. Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
6. Background information, including, as applicable:
 - a. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and

which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

- b. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
- c. A description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
- d. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or alike action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant; and
- e. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
- f. Any other information required by the Commission.

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

Sira will notify the Commission no more than one business day after a Sira Agent ceases to be associated with the establishment. The registration will be immediately voided when the Agent is no longer associated with the establishment.

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

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

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

Sira will comply with all Background Check requirements in the Regulations and any other sub-regulatory guidance issued by the Commission.

1. Application Process- During the application process Sira will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;
 - a. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities

contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings);

- b. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:
 - i. The individual's full legal name and any aliases;
 - ii. The individual's address;
 - iii. The individual's date of birth;
 - iv. A photocopy of the individual's driver's license or other government-issued identification cards;
 - v. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;
 - vi. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
- c. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
 - i. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing Marijuana for medical- or adult-use purposes, in which those individuals either owned shares of stock or served as board member, Executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - ii. A description and the relevant dates of any civil action under the laws of the Commonwealth, or other Jurisdiction including, but not limited to, a complaint relating to any professional or occupational or fraudulent practices;
 - iii. A description and relevant dates of any past or pending legal or enforcement actions in the Commonwealth or any other state against an entity whom the applicant served as a Person or Entity Having Direct or Indirect Control, related to the cultivation, processing, distribution, or sale of Marijuana for medical- or adult-use purposes;
 - iv. A description and the relevant dates of any administrative action with regard to any professional license, registration, or certification, including any complaint, order, stipulated agreement or settlement, or disciplinary action, by the Commonwealth, or like action in an Other Jurisdiction including, but not limited to, any complaint or issuance of an order relating to the denial, suspension, or revocation of a license, registration, or certification;
 - v. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or alike action by another Jurisdiction with regard to any professional license, registration, or certification, held by any Person or Entity Having Direct or Indirect Control, if any;
 - vi. A description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any Person or Entity Having Direct or Indirect Control that is part of the applicant's application, if any; and

vii. Any other information required by the Commission.

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

2. Background Checks not included in the Application Process- For all Marijuana Establishment Agent Registrations not included in the application process, Sira will submit Marijuana Establishment Agent applications for all required individuals. Sira will perform its own due diligence in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in 935 CMR 500.802.

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

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

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

Sira seeks to promote a workplace that is free from discrimination and harassment, whether based on race, color, gender, age, religion, creed, national origin, ancestry, sexual orientation, marital status, or disability. Inappropriate interference with the ability of Sira employees to perform their expected job duties is not tolerated. It is illegal and against Sira's policy for any employee, male or female, to harass another employee. Examples of such harassment include making sexual advances or favors or other verbal or physical conduct of a sexual nature a condition of any employee's employment; using an employee's submission to or rejection of such conduct as the basis for, or as a factor in, any employment decision affecting the individual; or otherwise creating an intimidating, hostile, or offensive working environment by such conduct. The creation of an intimidating, hostile, or offensive working environment may include but is not limited to such actions as persistent comments on an employee's sexual preferences, the display of obscene or sexually-oriented photographs or drawings, or the telling of sexual jokes. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory employment effect may not be viewed as harassment. Sira will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

Sira will not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit. Sira will not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

If an employee feels victimized by sexual harassment, they are instructed to report the harassment to their manager immediately. If their immediate manager is the source of the alleged harassment, they should report the problem to Executive Management. Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible. Any employee who makes a complaint, or who cooperates in any way in the investigation of the same, will not be subjected to any retaliation or discipline of any kind.

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

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

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

Sira strongly supports the policies of the Americans with Disabilities Act and is completely committed to treating all applicants and employees with disabilities in accordance with the requirements of that act. Sira judge individuals by their abilities, not their disabilities, and seeks to give full and equal employment opportunities to all persons capable of performing successfully in the company's positions. Sira will provide reasonable accommodations to any persons with disabilities who require them, who advise Sira of their particular needs. Information concerning individuals' disabilities and their need for accommodation will, of course, be handled with the utmost discretion.

Sira is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase, or transfer illegal drugs at any time while on Sira premises or while using Sira vehicles or equipment, or at any location during work time. No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug. Any violation of this policy will result in disciplinary action, up to and including termination.

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably

accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

Smoke-Free Workplace: Smoking is prohibited throughout the workplace. This policy applies equally to all employees, clients, partners, and visitors.

Employee Diversion of Marijuana: If a Sira Agent is found to have diverted marijuana, that agent will immediately be dismissed and have their Marijuana Establishment Registration Card confiscated. The CEO will immediately be notified. The CEO will make a detailed report of the event and report it to local law enforcement and the Commission within 24 hours.

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

1. Equal Opportunity Employment
2. Safety and Security
3. Background Check and CORI Requirements
4. Alcohol, Smoke, and Drug Free Work Environment
5. Zero Tolerance Diversion and Theft Policies
6. Cannabis Control Commission Issued Registration Card
7. Employee Rules of Conduct
8. Anti-Harassment
9. Non-Violent Workplace
10. Business Operating and Working Hours
11. Email and Internet Policy
12. Employee Attendance, Sick Time, and Vacation Time Off Requests
13. Visitor Rules and Procedures
14. Employee Performance Reviews
15. Responsible Vendor Training Requirements
16. Resignation or Termination of Employment
17. Employee Signed Acknowledgement of Handbook Receipt and Review



ENERGY PLAN-Retail

In compliance with 935 CMR 500.105(15) Sira has:

- Identified potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and implemented these opportunities to the extent possible;
- Considered opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- Reduced electric demand (such as lighting schedules, active load management, and energy storage); and
- Engaged with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

Sira will work closely with our local utility companies to create and execute interactive Energy Savings Plans, by means of:

- Understanding how we use energy through analysis generation;
- Compare our operation with similar businesses and act accordingly;
- Intake customized energy improvement recommendations from professionals; and
- Utilize cost incentives through utility energy performance.

Our construction administrators, superintendents, project managers, and their subcontracted team of architects, designers, and engineers will execute the retail buildout processes through pre-construction, construction, and review construction phases within preliminary planning guidelines that ensure the highest capacity of energy efficiency, both on the job and throughout the reasonable lifespan of the operation, including but not limited to:

- The purchase and installation of the highest R-Value insulation materials, that actively resist the conductive flow of heat, wherever applicable on site;
- The purchase and installation of LED lighting systems;
- The removal and disposal of outdated HVAC systems, with the purchase and installation of advanced HVAC systems and all associated ductwork.

Further practices to maintain energy efficiency throughout daily operations include:

- Using power strips to power all devices, and turning off all power strips at the conclusion of the closing process (excludes security systems);
- Using communal printers, coffee makers, microwave ovens, and refrigerators;
- Turning off monitors when leaving for more than one hour;

- Save paper by only photocopying what is absolutely needed, and always using the second side of sheets by either printing on both sides or using the blank side as scratch paper;
- Report any obvious energy waste or material deficiencies such as broken heaters or air leaks up the chain of command;
- Close or tilt window blinds to block direct sunlight to reduce cooling needs during warmer months;
- Prohibiting the use of individual space heaters;
- Using Energy Star labeled appliances.



QUALITY CONTROL AND TESTING

Sira Naturals maintains extensive quality control and testing policies and procedures to ensure the safe and effective production of all Sira products. Sira employs a highly qualified full-time Quality Assurance Manager. This position is independent of the various production departments and is responsible to the Chief Operating Officer. Sira maintains written quality control procedures for all production processes, including but not limited to:

- product manufacturing
- limited access to work in progress
- hygiene requirements
- clean in/clean out
- GMP for people and processes
- products handling
- materials and workflows
- product drying
- product thawing
- packing and handling
- equipment lockout/tagout
- recall procedures
- emergency actions
- pathogen exposure control
- product refrigeration
- food safety prerequisites
- equipment operations
- environmental testing
- hold and release procedures
- and many others

Sira will never sell or otherwise market marijuana product that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. All external testing of Sira marijuana products is performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) is performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Sira will only process the leaves and flowers of the female marijuana plant in a safe and sanitary manner as prescribed below:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area pursuant to 935 CMR 500.105(3)

Sira maintains a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1). The policy includes notifying the Commission within 72 hours of any laboratory

testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification is required to describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. Sira maintains the results of all testing for no less than one year. All Sira transportation of marijuana to and from Independent Testing Laboratories complies with 935 CMR 500.105(13).

In addition to third-party independent testing for all finished products, Sira also performs internal testing of marijuana products at various stages throughout the production process to ensure consistency and quality of products and raw materials. Internal testing ensures the suitability of materials used in all cultivation and production activities.

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

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

Sanitation

Sira’s Retail Marijuana facility will be designed and constructed with sanitation in mind.

All product contact surfaces will be smooth, durable, non-porous and easily cleanable.

- The walls, ceiling and floors of all storage and packaging areas will be constructed of materials that are smooth, durable and can be adequately kept clean and in good repair.
 - There will be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
 - The Retail Manager will prepare a cleaning and sanitation checklist for the staff to that cleaning and sanitation is performed in a consistent and satisfactory manner.
 - All contact surfaces, will be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination.
- The facility will provide sufficient space for the placement of equipment and storage

of materials as is necessary for the maintenance of sanitary operations and the sale of safe marijuana products.

- Lighting and Light Fittings - Shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over retail or storage areas or otherwise protect against marijuana product contamination in case of glass breakage.
 - Suspended lighting is constructed from non-corrodible and cleanable assemblies.
 - All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers.
 - Adequate safety lighting in all areas.
- Buildings, fixtures, and other physical facilities will be constructed in such a manner that allow them to be maintained in a sanitary condition.
- Litter and waste will be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests.
- Product Preparation Surfaces (stainless steel tables, scale surfaces and utensils) 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.
 - Pre-scrape surface to remove any soils.
 - Wash surface with recommended strength solution of pot & pan detergent.
 - Rinse with water and wipe dry.
 - Using trigger sprayer bottle and a different wiping cloth, applying hydrogen peroxide.
 - Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds.
 - Allow to air dry.
- Hand-washing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature.
 - Located in the packaging area and where good sanitary practices require employees to wash and sanitize their hands.
 - Provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
- Each of the facilities water supply comes from the municipal water supply and is sufficient for necessary operations.
- The facilities plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility.
 - Plumbing shall properly convey sewage and liquid disposable waste from the facility.
 - There will be no cross-connections between the potable and wastewater lines;
- The facility will provide its employees with adequate, readily accessible toilet

facilities that will be maintained in a sanitary condition and in good repair.

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

Contamination Control

- Training
 - All employees will be trained on pest prevention, pest management, pest detection, and pest treatments.
- Handling and storage of marijuana product or marijuana plant waste
 - All marijuana plant waste will be placed in the sealed “Marijuana Waste” container.
 - This container must impervious and covered.
 - All marijuana waste will be stored in the waste room in sealed containers until disposal.
- Handling and storage of non-marijuana waste.
 - All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles.
 - Recyclable
 - Organic
 - Solid waste
 - At the end of every day these containers will be emptied, and the contents removed from the building and placed in the appropriate secure containers to await pickup.
- All toxic materials including cleaning compounds, sanitizers, etc. will be stored in an area away from marijuana storage areas.
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

Personnel

All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000.

- Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination shall be excluded from any operations which may be expected to result in contamination of the facility or others until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.
 - Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Local Board of Health.
 - Sira will voluntarily comply with any and all isolation and/or quarantine orders

issued by the Local Board of Health or the Department of Public Health.

- Sira Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition.
- All Sira Agents shall conform to sanitary practices while on duty, including.
 - Maintain adequate personal cleanliness:

Grooming:

- Arrive at work clean – clean hair, teeth brushed, bathed, and used deodorant daily.
- Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
 - Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
- Wash hands (including under fingernails vigorously and thoroughly with soap and warm water for a period of at least 20 seconds:
 - When entering the facility before work begins
 - In the restroom after toilet use and when you return to your workstation
 - After touching face, nose, hair, or any other body part, and after sneezing or coughing
 - After cleaning duties
 - After eating or drinking
 - Any other time an unsanitary task has been performed – i.e., taking out garbage, handling cleaning chemicals, wiping tables, picking up a dropped item, etc.
 - Wash hands only in hand sinks designated for that purpose.
 - Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- Wear appropriate clothing – clean uniform with sleeves and clean non-skid close-toed work shoes (or tennis shoes) that are comfortable for standing and working on floors that can be slippery.

Cuts, Abrasions, and Burns:

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

Smoking, eating, and gum chewing:

- Sira facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- Eat and drink in designated areas only.

- Refrain from chewing gum or eating candy during work.

Training

Sira will provide training and training opportunities to all of its employees. In addition to required training, Sira will encourage advanced training to packaging agents in the areas of Good Manufacturing Practices and HACCP.

- All employees will be trained on Sanitation Procedures prior to or during the first day of employment.
 - Include basic product safety training as part of new employee orientation.
 - The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
 - The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
 - The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements
- Employees engaging in the packaging will be trained and certified in;
 - A nationally accredited Food Handler Program (i.e., ServSafe)
- Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide GMP, Sanitation and HACCP training.
- Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
- Document the content of all training sessions and attendance.



QUALIFICATIONS AND TRAINING

Sira ensures that all agents are qualified for the roles they assume and that they complete training prior to performing their job functions. Sira qualifies agent applicants by posting job descriptions on employment websites and trade boards. Potential applicant resumes are screened for appropriate qualifications. Qualified applicants are then personally interviewed in a three-step interview process. Once an applicant has been selected to join the team, Sira conducts a comprehensive background check to ensure that the applicant complies with the Commission's regulations regarding qualifications.

Training is tailored to the roles and responsibilities of the job function of each agent and includes a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, all staff receives eight hours of on-going training annually.

Within 90 days of hire, all owners, managers and employees involved with handling marijuana will successfully complete the Responsible Vendor training and annually thereafter, so Sira can maintain its designation as a "responsible vendor." Sira will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Sira Naturals relies on its employees to be engaged, compassionate, committed and collaborative. Employees are required to have the applicable skills and qualifications to successfully carry out assigned duties, be prepared to respond appropriately to customer and vendor needs and comply with operational and regulatory requirements. Employees undergo an intensive orientation to introduce the Employee Handbook, Code of Conduct, Emergency Preparedness Guide, Incident Management Protocols and a review of the Commission's regulations at 935 CMR 500.000 et. seq. Employees are cross-trained within areas they are authorized to access.

Qualifications for Sira Agents

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

Sira Agents must;

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

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

Required Training for Sira Agents

Pursuant to 935 CMR 501.105(8) Sira will ensure all Sira Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

- As a CMO, Sira will train all agents who are both an ME agent and a marijuana establishment in both 935 CMR 500.105(2)(a) and (b), and 935 CMR 501.105(8): ME Agent Training, including training regarding privacy and confidentiality requirements for patients. Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission.
- Our initial training begins during employee orientation where all new employees will be issued their employee handbook. Classroom or online training on this day will include, but not be limited to;
 - Code of Conduct;
 - Marijuana Regulations;
 - Security and Safety;
 - Emergency Procedures/Disaster Plan;
 - Diversion of Marijuana;
 - Terminable Offences;
 - Confidential Information;
 - Employee Policies (all employee policies from the handbook will be covered) including but not limited to;
 - Alcohol, smoke and drug-free workplace;
 - Equal Employment Policy;
 - Anti-Harassment and Sexual Harassment Policy;
 - Americans with Disability Act;
 - Employee Assistance Policy; and
 - Diversity Plan

- After the initial training is complete agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online or computerized or by means of on the job training (“OJT”).
- All of Sira Agents will receive a minimum of 8 hours of training annually.
- Sira will record, maintain and store documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters. These records will be stored in the Agents Training File. Training records will be retained by Sira for at least seven year after agents’ termination.
- Sira will require all of its Agents, Owners and Managers to attend and complete a Responsible Vendor Training Program to become designated as a “responsible vendor”.
 - After the responsible vendor designation is applied each Sira owner, manager, and Agent involved in the handling and sale of marijuana for adult use will successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.”
 - Although administrative employees who do not handle or sell marijuana are not required to take the responsible vendor program, Sira will allow and encourage them to attend on a voluntary basis.
 - Sira will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.



RESTRICTING ACCESS TO AGE 21 AND OLDER-RETAIL

The Adult-Use cannabis regulations at 935 MR 500.000 et. seq. contains a variety of restrictions on access to Marijuana Establishments to those who are under 21 years of age. All Sira board members, directors, employees, executives, managers, and volunteers must be 21 years of age or older. Employees include a consultant or contractor who provides on-site services to Sira Naturals related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

Sira Management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Sira are 21 years of age or older, except in the case of a Registered Qualifying Patient with the Massachusetts Medical Use of Marijuana Program in possession of a valid Program ID from the Commission.

Sira will Positively identify all individuals seeking access to the facility to limit access solely to individuals 21 years of age or older, or registered Qualifying Patients or personal caregivers.

Upon entry into the facility by an individual, a Sira agent will immediately inspect the individual's proof of identification and determine that the individual is 21 years of age or older. A patient registration card is not sufficient proof of age.

- If the individual is between 18 and 21 years of age, he or she shall not be admitted unless they produce an active patient registration card issued by the Commission.
- If the individual is younger than 18 years old, he or she shall not be admitted without an active patient registration card and a personal caregiver with an active patient registration card.
- In addition to the patient registration card, registered Qualifying Patients 18 years of age and older and personal caregivers must also produce proof of identification.

Other individuals who can access the facility include:

- Sira Agents (including board members, directors, employees, executives, managers, or volunteers)
 - While at the facility or transporting marijuana for the facility all Sira Agents must carry their valid Agent Registration Card issued by the Commission
 - All Sira Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card.
- Visitors (including outside vendors and contractors)
 - Prior to being allowed access to the facility or any Limited Access Area, the visitor must produce a Government issued Identification Card to a member of the management team and have their age verified to be 21 years of age or older.

- If there is any question as to the visitors age, or of the visitor cannot produce a Government Issued Identification Card, they will not be granted access.
 - After the age of the visitor is verified they will be given a Visitor Identification Badge
 - Visitors will be escorted at all times by a marijuana establishment agent authorized to enter the limited access area.
 - Visitors will be logged in and out of the facility and must return the Visitor Identification Badge upon exit.
 - The visitor log will be available for inspection by the Commission at all times
- Representatives of the Commission, Emergency Responders and Law Enforcement.
 - The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:
 - Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
 - Representatives of other state agencies of the Commonwealth; and
 - Emergency responders in the course of responding to an emergency.
 - Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
 - Individuals described above in this policy will be granted immediate access to the facility.

Age Verification

To verify an individual is 21 or older Sira Agent must receive and examine from the individual one of the following authorized government issued ID Cards;

- Massachusetts Issued driver's license
- Massachusetts Issued ID card
- Out-of-state driver's license or ID card (with photo)
- Passport
- U.S. Military I.D.
 - To verify the age of the individual the Agent will use an Age Verification Smart ID Scanner that will be supplied by Sira .
 - In the event that the ID is not a scannable ID, or if for any reason the scanner is not operational or available or if the ID is questionable the Agent must use the **FLAG** methodology of ID verification

F. Feel

- Have the customer remove the ID from their wallet or plastic holder (never accept a laminated document)

- Feel for information cut-out or pasted on (especially near photo and birth date areas)
- Feel the texture – most driver’s license should feel smooth, or (depending on your State) they will have an identifying texture

L. Look

- Look for the State seals or water marks; these seals are highly visible without any special light.
- Look at the photograph. Hairstyles, eye makeup and eye color can be altered, so focus your attention on the person’s nose and chin as these features don’t change. When encountering people with beards or facial hair, cover the facial hair portion of the photo and concentrate on the nose or ears.
- Look at the height and weight. They should reasonably match the person.
- Look at the date of birth and do the math!
- Compare the age on the ID with the person’s apparent age.
- Look at the expiration date. If the ID has expired, it is not acceptable.
- If needed, compare the ID to the book of Government Issued ID’s

A. Ask

- Ask questions of the person, such as their middle name, zodiac sign, or year of high school graduation. Ask them the month they were born. If they respond with a number, they may be lying. If the person is with a companion, ask the companion to quickly tell you the person’s name.
- If you have questions as to their identity, ask the person to sign their name, and then compare signatures.

G. Give Back

- If the ID looks genuine, give the ID back to the customer and allow entry.
- If for any reason the identity of the customer or the validity of the ID is in question, the individual will not be granted access to the facility.

Training

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

All Sira agents will enroll and complete the Responsible Vendor Training Program when it is available. This curriculum will include:

- Diversion prevention and prevention of sales to minors;
- Acceptable forms of identification, including:

- How to check identification;
- Spotting false identification;
- Medical registration cards issued by the Commission;
- Provisions for confiscating fraudulent identifications; and
- Common mistakes made in verification.



MAINTAINING OF FINANCIAL RECORDS

Sira Naturals' business success rests, in part, on sound financial recordkeeping practices. Without accurate records it is impossible to determine the financial condition or profitability of the business. Sira Naturals maintains a staff of internal accounting personnel and a sophisticated financial record keeping system to guide Sira management in financial decision making.

Sira Naturals employs an Enterprise Resource Planning Platform to track and record all financial and operational transactions. The ERP system records all internal and external transactions to a general ledger and maintains journals for accounts receivable, accounts payable, payroll, inventory, petty cash, and other financial accounts. The system records and stores all income and expenses and provides reports on demand for all accounts. The system generates all financial statements (balance sheet, income statement, cash flow statement, etc.) on demand. All such financial records are maintained according to the statutory and regulatory minimum time frames.

Sira Naturals maintains a secure electronic record keeping system to store all contracts, agreements, leases, titles, licenses, insurance policies, permits and other key documents. Sira employs a third-party provider to handle payroll disbursements and records. Sira maintains a contractual relationship with its payroll provider that includes provisions for the security of data and action plans in the vent of data breach. Sira engages third-party professional tax advisors and maintains all tax records in a secure records system that is only accessible to authorized personnel.

Sira Naturals engages third-party banking services from a licensed banking institution. This banking institution monitors all Sira Naturals transactions pursuant to guidance from the Financial Crimes Enforcement Network (FinCen) entitled: *BSA Expectations Regarding Marijuana-Related Businesses* (Feb. 2014). Though Sira does not have direct access to reports filed with FinCen by our banking institution, if there is any unexplained financial activity occurring with any of Sira's business accounts, Sira is to be notified by our banking institution and given an opportunity to explain or correct such activity. From the inception of the organization to today, Sira has never been notified of any unexplained financial activity occurring in any of its business accounts.

Sira Naturals maintains a number of different accounts with its financial institution, including business banking accounts, petty cash accounts, budget reserve accounts and others. Sira monitors these accounts on a systematic basis to ensure that no activity that is inconsistent with its expectations is occurring.

When Sira is involved in, or anticipates that it may be involved in, litigation that implicates financial records, the CEO's office will issue a litigation hold on any such records. This means that all financial records and documents relating to the litigation matter must be set aside in order to preserve any potential evidence. In the event that the CEO announces a litigation hold on any or all Sira financial records as a result of pending or anticipated litigation, all such records covered **MUST NOT** be discarded, deleted or destroyed.

Sira Naturals takes reasonable and prudent steps to ensure the security of all financial records and that such records are only accessible to authorized individuals.

Access to the Commission

All Sira electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with

generally accepted accounting principles. All written records required in any section of 935 CMR 500.000, 501.000, 502.000 are subject to inspection.

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

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

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

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

Point of Sale (POS) Systems

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

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

- date of sale,
- method of payment, and
- POS terminal number and POS transaction number.
- Sira will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:
 - Internal sequential transaction numbers;
 - Records of all POS terminal activity; and
 - Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
 - The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
 - Any and all activity related to other operating modes available in the system, such as a training mode; and
 - Any and all changes in the setup of the system.
- Sira will comply with the provisions of 935 CMR 500.000, 501.000, 502.000 but specifically herein to 935 CMR 500.140(6): Recording Sales.
 - Sira will only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.
 - Sira may utilize a sales recording module approved by the DOR.
 - Sira will not utilize software or other methods to manipulate or alter sales data.
 - Sira will conduct a monthly analysis of our equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Sira will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Sira 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:
 - We will immediately disclose the information to the Commission;
 - We will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - We will take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Sira will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
 - Sira will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
 - Sira will allow the Commission and the DOR may audit and examine our point-of-sale system in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000;
 - As a Colocated Marijuana Operations (“CMO”), Sira will maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10): Patient Supply.

Virtual Separation

As a Colocated Marijuana Operations (“CMO”), Sira will implement procedures for virtual, i.e., electronic, separation of medical-use and adult-use marijuana, MIPs, and marijuana products subject to Commission approval. We will utilize plant or package tags in the Seed-to-sale SOR

to fulfil this requirement.



Diversity Plan

I. Intent

Sira Naturals, Inc. (“Sira”) is committed to creating a diverse workforce by utilizing hiring practices that do not discriminate against women, minorities, veterans, persons with disabilities and LGBTQ+ individuals. Furthermore, it is our belief that the more diverse and inclusive our team is the more successful Sira will be in Massachusetts as we seek to utilize ideas and innovations from a variety of backgrounds, experiences and cultures.

II. Purpose

Sira’s Diversity Plan has been created to ensure that our hiring practices create a diverse and inclusive organization. In doing so, individuals will be able to apply their life experiences and talents to support the goals of the company.

Sira’s Diversity Plan is meant to be an evolving document designed to guide decisions and practices that ensure we are able to reach our goals described below. The Diversity Plan represents an initial approach to establish a comprehensive management plan with goals and measures for inclusion and diversity. The Diversity Plan will be evaluated and modified, when necessary, as our company grows and expands.

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

III. Proposed Initiatives, Goals and Metrics

GOAL 1: Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforces.

Proposed Initiative: As part of its hiring plan, Sira will seek to hire a workforce that is made up of at least 50% women and 25% described as minorities, 10% veterans, people with 5% disabilities, and 10% LGBTQ+ individuals with a goal to increase the number of individuals falling into these demographics working in the establishment. Hiring opportunities will be posted as needed to fulfill the company’s hiring needs. To achieve this goal, Sira will:

- Create gender-neutral job descriptions.
- Recruit from state and local employment staffing groups such as Masshire Career Center.

- Post hiring needs in a variety of web-based recruitment platforms such as indeed.com;
- Participate in local hiring events and job fairs, at least two annually, including events held by the Massachusetts Cannabis Business Association (MassCBA);
- Attend community group meetings in and around Boston, Somerville, Watertown, Chelsea and Revere, at least two annually, to introduce Sira and address our existing hiring needs to attract a diverse array of individuals, with an emphasis on those affiliated with the cannabis industry.

Sira will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. Sira will engage with community groups and leaders to further identify ways in which to attract candidates that may not otherwise be aware of employment opportunities with Sira. To ensure that our workplace is an inclusive environment and to promote equity among our team, all hiring managers will undergo training to address bias and cultural sensitivity.

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

GOAL 2: Ensure that at least 25% participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.

Proposed Initiative: To accomplish this goal, Sira will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minority groups; women, veterans, people with disabilities, and LGBTQ+ individuals. (herein referred to as Plan Populations).

Metrics and Evaluation: Sira will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by Plan Populations and will calculate the percentage of services and members of its supply chain who meet this requirement. Sira will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the Plan Populations and give supplier contractor priority to these businesses. In order to target a diverse supplier base, Sira will post hiring needs in diverse publications such as a variety of web-based recruitment platforms such as indeed.com and attend community group meetings, at least two annually, to introduce Sira and address the existing hiring needs to attract a diverse array of suppliers. Sira will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. During its engagement with community groups and leaders

referenced in Goal 1, Sira will further identify ways in which to attract diverse supply chain candidates that may not otherwise be aware of employment opportunities with Sira. Sira's goal will be to work with at least 15% of businesses who identify as one of the Plan Populations throughout its supply chain and services. Sira will assess these percentages annually and will be able to demonstrate and document to the Commission the progress or success will be documented one year from provisional licensure.

IV. Conclusion

Sira will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Diversity Plan. Any actions taken, or programs instituted by Sira will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.